

## Chapter 11: Comments on the Draft EIS

### 11.1 Public Comments on the Draft EIS

This chapter contains the responses to comments received on the Southern Corridor Draft EIS, both oral and written, from members of the public, government agencies, and nongovernment organizations during the public comment period. Individuals who commented on the Draft EIS are listed in Table 11.1-1 below along with their respective commenter identification number. This number can be used to find the comments that were submitted and to locate the corresponding table on which responses to each comment are provided.

Section 11.2 presents a reproduction of written comments and Sections 11.3 and 11.4 present transcripts of oral comments that were received in response to the Draft EIS at the Hurricane and St. George public meetings. Comment documents are identified by the commenter ID number, and each statement or question that was categorized as addressing a separate environmental issue is designated with a sequential comment number.

Section 11.5 (Table 11.5-1) presents the responses to comments to the Draft EIS that were received. Responses to specific comments can be found by locating the corresponding commenter ID number and sequential comment number identifiers.

**Table 11.1-1. Public Comments on the Draft EIS**

<b>Commenter and Affiliation</b>	<b>ID Number</b>
Ron McCollum	C-01
(No name provided)	C-02
Deana Mills	C-03
(No name provided)	C-04
Junius Campbell	C-05
Mary Bray	C-06
Roy Bray	C-07
David Isom	C-08
John Donnell	C-09
(No name provided)	C-10
James L. Dykmann – Deputy State Historic Preservation Officer (Archaeology)	C-11
Leigh J. Kuwanwisiwma – Director, Hopi Cultural Preservation Office	C-12
R.G. Smith	C-13
Charles Reeve	C-14
Lavoid Leavitt	C-15
Ray Rosenthal – Colliers International Real Estate	C-16
Don Musich – Skyridge Homes	C-17
Carol Musich	C-18
Douglas Klein	C-19
Royden Wittwer	C-20
David J. Demas – City of St. George	C-21
James Blanchmore – La Verkin City Board of Adjustments	C-22
Howard Bardwell	C-23
Larry Bulloch – City of St. George	C-24

<b>Commenter and Affiliation</b>	<b>ID Number</b>
Jacqueline Dubois	C-25
Jack M. Farnsworth	C-26
Jay Beacham	C-27
Sheldon Green	C-28
Jay and Bonnie Mainteer	C-29
Tom Hirschi – Mayor, City of Hurricane	C-30
Tom Shelly	C-31
Jim Steitz	C-32
Deloss S. Hammon – Alliance Consulting	C-33
Vyonne S. Mendenhall – A.R. Spilsbury Family Enterprises	C-34
John D. and Constance J. Clemens	C-35
Joel M. Peterson and Elaine York – The Nature Conservancy of Utah	C-36
Calvin and Mona Lowe	C-37
Paul and Dory Woollard	C-38
Elaine Mills	C-39
Glen Mills – Kings Court Properties	C-40
Lea Thompson – Thompson Family Pecan Farm	C-41
Jim Ward – Leucadia Financial Corporation	C-42
Joseph Perrin	C-43
(No name provided)	C-44
Richard Spotts	C-45
Ray Urbaniak	C-46
Ronald Thompson – WCWCD	C-47
Curt Gordon – SITLA	C-48
Russell Bezette	C-49
Richard DeLappe	C-50

Commenter and Affiliation	ID Number
Daniel R. Patterson – Center for Biological Diversity	C-51
Bob Hoffa – Grand Canyon Trust	C-52
William H. King – Utah Native Plant Society	C-53
Jean Binyon – Sierra Club, Utah Chapter	C-54
Nina Dougherty and Mark Clemens – Sierra Club, Utah Chapter	C-55
Cynthia Cody – EPA	C-56
William H. King and Tony Frates – Utah Native Plant Society; Bob Hoffa – Grand Canyon Trust; Daniel R. Patterson – Center for Biological Diversity	C-57
Willie R. Taylor – U.S. Department of the Interior, Office of Environmental Policy and Compliance	C-58
Roger G. Taylor – BLM Arizona Strip Field Office; James D. Crisp – BLM St. George Field Office	C-59
John Harja – Utah Governor's Office of Planning And Budget	C-60
Gary S. Espin – City of St. George	C-61
Gene Sturzenegger – Winding River Realty Utah	C-62
Alan D. Gardner, James J. Eardley, and Jay Ence – Washington County Commission	C-63
Gregg Frohman	C-64
David Orr	C-65
Lisa Mills	C-66
Maria Tilelli	C-67
Jere Gimbel	C-68
Janet Gillette	C-69
Kirsten Shaw Fox	C-70
Henry R. Maddux – USFWS, Utah Field Office	C-71
Hank Isaksen – Outlaw Ridge Development Co.	C-72
Deloss S. Hammon – Alliance Consulting	C-73

Commenter and Affiliation	ID Number
Darrell Hercyk	C-74
Judith Allison	C-75
R.G. Smith	T-01
Sharon Orgill	T-02
Dale V. Orgill	T-03
Margaret Pamela Humphries	T-04
Mrs. Dubois	T-05
Mr. Dubois	T-06
Mrs. Thomas Blake	T-07
Brent Clove	T-08
Burton L. Sant	T-09
David Hyatt	T-10
Desiree Whitehead	T-11
Kenneth L. Allison	T-12
Mary Farrington	T-13
Lowell Elmer – Director, Dixie Metropolitan Planning Organization	T-14
Melvin L. Lloyd	T-15

## 11.2 Reproductions of Written Comment Documents

	COMMENT NUMBER		COMMENT NUMBER
<p><b>Donegan, Nicole</b></p> <hr/> <p><b>From:</b> Ron McCollum [ronmcc@redrock.net]  <b>Sent:</b> Monday, April 14, 2003 4:59 PM  <b>To:</b> Donegan, Nicole  <b>Subject:</b> Southern Corridor Project</p> <p>After viewing the proposed new road project from Hurricane to I - 15 I am deeply disappointed. This is a road that goes essential nowhere and won't for the next ten or fifteen years.</p> <p>It will not relieve any traffic on SR -9 and will not assist in relieving the traffic going to or from ST George. The only reason for the road is to exist is to help developers sell property.</p> <p>What we need is another access to ST George that will help alleviate the traffic on State Road 9 and help remove the constant traffic jam on ST George Blvd. for people trying to access I-15.</p> <p>Until the "New Airport" exists there is no reason for the the road and even then unless you are traveling from the "proposed" Housing projects to the "Proposed" Airport, the route has no value that I can see since most traffic is going to be going to ST George. It certainly isn't any quicker for tourist to go past the Airport to Zion. The only value for the road at all is if you put it in at 4300 and State Road 9 they would have to get rid of those nasty sewage ponds.</p> <p>1</p>	C-01		C-02
	C-01.1		
	C-01.2		
	C-01.3		
		<p>APR 17 2003</p> <p><i>I Could Care Less  I just want to sell my house  so I can be with my family  in Denver (aka where it snows)  Summers no so terrible hot  4400 W State H.W. 49  Hurricane, Utah</i></p>	C-02.1



COMMENT  
NUMBER

C-03

C-03.1

C-03.2

COMMENT  
NUMBER

C-04

C-04.1



**Southern Corridor**  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



Please tell us how you found out about this public hearing.

☒ Newspaper Announcement   ☐ Web Site   ☐ Invitation   ☐ Flyer  
☐ Other \_\_\_\_\_

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support? 2800 Road 2800 W I like

Which alternative do you prefer and why? It will be closer to get to from SR-9 so we don't have to go clear up to 4300 W

Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately. It's mostly farm land waiting to be developed

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns? yes

What other transportation projects should UDOT explore in the future? \_\_\_\_\_



**Southern Corridor**  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



Please tell us how you found out about this public hearing.

☒ Newspaper Announcement   ☐ Web Site   ☐ Invitation   ☐ Flyer  
☐ Other \_\_\_\_\_

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support? #2800W route

Which alternative do you prefer and why? It looks like #2800 W would be the best choice of routes, & where as they have removed a lot of clay out of section 1, they can make a lake out of that section and fill it with water from Lake Powell and then route the water when full over to Lake Sand Hollow. Route #2800 would serve both lakes for recreation.  
Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns? yes

What other transportation projects should UDOT explore in the future? \_\_\_\_\_

## Southern Corridor

Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form

HDR

Please tell us how you found out about this public hearing.

☒ Newspaper Announcement ☐ Web Site ☐ Invitation ☐ Flyer  
☐ Other \_\_\_\_\_

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support? Safety is the most important

Which alternative do you prefer and why? Alt. Nat. the Corridor  
Highway 59 Needs a Big Overhaul to  
make it a safer road

Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.

To deal with wild life & artifacts - people  
and safety are what's important

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns?

Remains to be seen

What other transportation projects should UDOT explore in the future?

To fare behind and to many to mention

COMMENT  
NUMBER

C-05

## Southern Corridor

Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form

HDR

Please tell us how you found out about this public hearing.

☒ Newspaper Announcement ☐ Web Site ☐ Invitation ☐ Flyer  
☐ Other \_\_\_\_\_

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support? I support the continued investigation  
of the impact of the three roads proposed. I support  
the possibility of trading BLM land vs buying from  
private owners

Which alternative do you prefer and why? I support the 2800 West  
Alternative because it will create less of an environmental  
impact. I see it as an additional support to the  
Sand Hollow State Park. Even tho it might be a little more  
costly, it affects less groundwater wells. I see it bringing  
more tourist dollars into the area.

Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately. What wildlife  
will be impacted? We have some unique plant life that  
needs to be preserved. Archaeological finds are being  
discovered every day and we would ask for awareness of  
construction erosion. What kind of roads, maintenance  
will be provided & by whom? Don't know about  
historic sites.

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns? Yes, pretty much.  
I am sure I will have questions later.

What other transportation projects should UDOT explore in the future? Additional  
exit & entrance ramps in St. George on I 15,  
when state runs across Virgin bridge through  
Jacqueline. On route 59 so you don't have to go  
through middle of town on a narrow road  
to go to Grand Canyon.

COMMENT  
NUMBER

C-06

C-06.1

C-06.2

C-06.3

COMMENT  
NUMBER

C-06  
(cont'd)

C-06.4



Southern Corridor  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



Additional comments (attach additional sheets if necessary):

*This seems to be a rapidly growing area and the road section & organization is not keeping up with the growth. Having lived here 5 yrs, I would like to see the area remain smaller & less impactful on the environment, but progress is happening. Let's keep up with it. We are the gateway to some of the most beautiful scenery & best recreational areas I have seen. Provide adequate roads to these areas in a timely manner.*

Name: Mary Bray  
Organization: \_\_\_\_\_  
City, State, Zip: Herriman, UT 84737  
Phone Number: 635-5975 E-mail: mary@resourcerealizations.com  
Would you like to be added to our mailing list? ☒ Yes ☐ No

Leave this comment form in the drop box,  
mail it to the address at right, or comment online at  
[www.udot.utah.gov/sc](http://www.udot.utah.gov/sc). All comments must be received  
by May 30, 2003.

Southern Corridor Project  
HDR Engineering, Inc.  
3995 South 700 East, Suite 100  
Salt Lake City, UT 84107



Southern Corridor  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



Please tell us how you found out about this public hearing.

☒ Newspaper Announcement ☐ Web Site ☐ Invitation ☐ Flyer  
☐ Other \_\_\_\_\_

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support?

Which alternative do you prefer and why? #3. It seems to offer access further east - more options to I-15 and Telegraph Rd; all? would not be brushed up one after another. It seems to be least intrusive on the environment. I don't care about its effect on "developments" - they can provide their own roads.

Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns?

① possibly - if I had known what questions to ask  
② yes I was given several options to voice my concerns.

What other transportation projects should UDOT explore in the future?

① 59 access that does go thru downtown Hurricane.  
② Make I-15 exits between SR 63 & SR 64, Hurricane

COMMENT  
NUMBER

C-07

C-07.1



	COMMENT NUMBER		COMMENT NUMBER
<div data-bbox="128 310 226 371"> </div> <div data-bbox="285 298 707 378"> <p><b>Southern Corridor</b> Draft Environmental Impact Statement (DEIS) Public Hearing Public Comment Form</p> </div> <div data-bbox="777 321 856 358"> </div> <p>Additional comments (attach additional sheets if necessary):</p> <p><i>Whichever route you take, move quickly to get all the right of way - before costs go up too much.</i></p> <p><i>Can you trade some land elsewhere to get land along route #3?</i></p> <p>Name: <u>Roy Bray</u>  Organization: <u>Self</u>  City, State, Zip: <u>Hurricane, UT 84737</u>  Phone Number: <u>435-625-5975</u> E-mail: <u>roy2@outwest.com</u>  Would you like to be added to our mailing list? <u>Yes</u> <u>No</u></p> <p><small>Leave this comment form in the drop box, mail it to the address at right, or comment online at <a href="http://www.udot.utah.gov/sc">www.udot.utah.gov/sc</a>. All comments must be received by May 30, 2003.</small></p> <div data-bbox="558 1078 777 1156"> <p><small>Southern Corridor Project HDR Engineering, Inc. 3995 South 700 East, Suite 100 Salt Lake City, UT 84107</small></p> </div>	<p>C-07 (cont'd)</p> <p>C-07.2</p>	<div data-bbox="1077 310 1176 371"> </div> <div data-bbox="1232 295 1659 373"> <p><b>Southern Corridor</b> Draft Environmental Impact Statement (DEIS) Public Hearing Public Comment Form</p> </div> <div data-bbox="1717 321 1797 358"> </div> <p>Please tell us how you found out about this public hearing.</p> <p><input checked="" type="checkbox"/> Newspaper Announcement   <input type="checkbox"/> Web Site   <input type="checkbox"/> Invitation   <input type="checkbox"/> Flyer  <input type="checkbox"/> Other _____</p> <p>Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support?</p> <p>Which alternative do you prefer and why? <i>I prefer 2800 West. The maps show that alignment of Highway 89 &amp; 9000 from just west of SR-9. Development in the Hurricane area, such as the Sun Ranch 90, will all go into Hurricane City instead of St. George, which will result in a lot of congestion.</i></p> <p>Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.</p> <p>Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns?</p> <p>What other transportation projects should UDOT explore in the future?</p>	<p>C-08</p> <p>C-08.1</p>

COMMENT  
NUMBER

C-09

C-09.1

COMMENT  
NUMBER

C-09  
(cont'd)

C-09.2



**Southern Corridor**  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



Please tell us how you found out about this public hearing.

- ☒ Newspaper Announcement   ☐ Web Site   ☐ Invitation   ☐ Flyer  
☐ Other \_\_\_\_\_

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support?

Which alternative do you prefer and why? *I have no financial or other interest (not know anyone who does) in the Cottonwood Development but I think it better to avoid destroying it by going through the middle. Although I recognize the safety problem of going SR-9 near the river bridge, I prefer the 4300 W.*

Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns? *Yes*

What other transportation projects should UDOT explore in the future?



**Southern Corridor**  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



Additional comments (attach additional sheets if necessary):

*I came to the meeting primarily to be sure that a bicycle/walking horse trail is planned to parallel the trail way when built. I was told that the right-of-way as planned will permit this.*

Name: *John D. Donnell*  
Organization: *Virgin R. Land Preservation Assoc. 3 Rivers Trails Committee*  
City, State, Zip: *St George, UT 84790*  
Phone Number: *435-656-4601* E-mail: \_\_\_\_\_  
Would you like to be added to our mailing list? ☒ Yes   ☐ No

Leave this comment form in the drop box, mail it to the address at right, or comment online at [www.udot.utah.gov/sc](http://www.udot.utah.gov/sc). All comments must be received by May 30, 2003.

Southern Corridor Project  
HDR Engineering, Inc.  
3995 South 700 East, Suite 100  
Salt Lake City, UT 84107

<div data-bbox="126 305 220 367"> </div> <div data-bbox="287 297 697 370"> <p><b>Southern Corridor</b> Draft Environmental Impact Statement (DEIS) Public Hearing Public Comment Form</p> </div> <div data-bbox="772 318 844 354"> </div> <div data-bbox="176 454 577 472"> <p>Please tell us how you found out about this public hearing.</p> </div> <div data-bbox="176 487 678 527"> <p><input checked="" type="checkbox"/> Newspaper Announcement   <input type="checkbox"/> Web Site   <input type="checkbox"/> Invitation   <input type="checkbox"/> Flyer <input type="checkbox"/> Other _____</p> </div> <div data-bbox="176 547 806 584"> <p>Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support? _____</p> </div> <div data-bbox="176 691 806 777"> <p>Which alternative do you prefer and why? <u>4300 West</u> <u>Most Direct &amp; Centrally Located</u> <u>and Close to I.R. Freeway</u></p> </div> <div data-bbox="176 824 806 880"> <p>Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately. <u>none</u></p> </div> <div data-bbox="176 989 806 1031"> <p>Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns? <u>yes</u></p> </div> <div data-bbox="176 1133 844 1218"> <p>What other transportation projects should UDOT explore in the future? <u>Belt</u> <u>Loop Around St. George -</u> <u>Atkinsonville was H West and North to Seaplane-Turner</u> <u>East to Exit 10 and 13 South to Southern Corridor.</u></p> </div>	<div data-bbox="911 196 1024 245"> <p><b>COMMENT NUMBER</b></p> </div> <div data-bbox="938 251 1005 276"> <p>C-10</p> </div> <div data-bbox="938 698 1005 722"> <p>C-10.1</p> </div>	<div data-bbox="1129 293 1207 371"> </div> <div data-bbox="1226 293 1482 336"> <p>State of Utah</p> </div> <div data-bbox="1226 336 1579 391"> <p>Department of Community and Economic Development Division of State History Utah State Historical Society</p> </div> <div data-bbox="1110 396 1207 444"> <p>Michael O. Leavitt Governor Max J. Evans Director</p> </div> <div data-bbox="1226 396 1436 444"> <p>300 Rio Grande Salt Lake City, Utah 84101-1182 (801) 533-3500 FAX: 533-3503 TDD: 533-3502 usa@history.state.ut.us http://history.utah.org</p> </div> <div data-bbox="1673 300 1759 371"> </div> <div data-bbox="1396 475 1501 493"> <p>April 4, 2003</p> </div> <div data-bbox="1644 456 1749 480"> <p>APR 10 2003</p> </div> <div data-bbox="1129 565 1350 644"> <p>Vincent Izzo HDR Engineering, Inc. 3995 South 700 East, Suite 100 Salt Lake City UT 84107-2594</p> </div> <div data-bbox="1129 656 1436 680"> <p>RE: DEIS for the Southern Corridor Project</p> </div> <div data-bbox="1129 691 1425 716"> <p>In Reply Please Refer to Case No. 99-0576</p> </div> <div data-bbox="1129 729 1245 753"> <p>Dear Mr. Izzo:</p> </div> <div data-bbox="1129 764 1740 824"> <p>The Utah State Historic Preservation Office received the referenced information on April 1, 2003. After consideration of the consultation request in behalf of the FHWA, the Utah Preservation Office provides the following comments per §36CFR800.</p> </div> <div data-bbox="1129 837 1740 898"> <p>USHPO offers no technical comments for the draft EIS. The understanding and analysis of historic and archaeological property is appropriate and should be useful in understanding the undertaking's potential to effect cultural resources.</p> </div> <div data-bbox="1129 909 1759 958"> <p>This information is provided to assist with Section 106 responsibilities as per §36CFR800. My email address is: jdykman@utah.gov</p> </div> <div data-bbox="1388 958 1665 1102"> <p>As ever,  James L. Dykman Deputy State Historic Preservation Officer - Archaeology</p> </div> <div data-bbox="1129 1115 1291 1140"> <p>JLD:99-0576 FHWA</p> </div> <div data-bbox="1129 1151 1684 1200"> <p>c: Susan G. Miller, NEPA/NHPA Specialist, Region Four Environmental, Utah Department of Transportation, 1345 South 350 West, Richfield UT 84701</p> </div> <div data-bbox="1264 1235 1644 1260"> <p>Preserving and Sharing Utah's Past for the Present and Future</p> </div>	<div data-bbox="1873 196 1978 245"> <p><b>COMMENT NUMBER</b></p> </div> <div data-bbox="1902 251 1959 276"> <p>C-11</p> </div> <div data-bbox="1892 842 1969 867"> <p>C-11.1</p> </div>
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COMMENT  
NUMBER

C-12

COMMENT  
NUMBER

C-12  
(cont'd)

04/04/03 08:09 FAX 520 734 2331

Cultural Preserv

02

THE HOPI TRIBE



Wayne Taylor, Jr.  
CHAIRMAN  
Elgean Joshevama  
VICE-CHAIRMAN

December 26, 2002

Ms. Susan Miller, NEPA/NHPA Specialist  
Region Four, Utah Department of Transportation  
1345 South 350 West  
Richfield, Utah 84701

Re: SP-LCS3(1); Southern Corridor

Dear Ms. Miller,

Thank you for your correspondence dated December 9, 2002, regarding the Utah Department of Transportation (UDOT) proposing to provide an alternative route between Hurricane and St. George, Utah. As you know, the Hopi Cultural Preservation Office previously responded to a correspondence from Montgomery Archaeological Consultants on this proposal in the attached letter dated May 25, 1999. Therefore, we appreciate your continuing solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office has reviewed the enclosed Draft Determination of Eligibility of Effect and Draft *Cultural Resource and Fossil Inventory of Utah Department of Transportation's Southern Corridor Project, Washington County, Utah*, by Montgomery Archaeological Consultants. We note that the survey identifies 104 prehistoric/protohistoric and 13 multi-component sites, and that each of the alternatives will adversely affect between 20 and 22 sites, many of which are on Bureau of Land Management (BLM) lands. Therefore, the Hopi Cultural Preservation Office has determined that many historic properties of traditional religious and cultural importance will be affected by this undertaking.

As you know, BLM Instructional Memoranda 98-131-2, prohibit reburial of human remains and associated objects subject to the Native American Graves Protection and Repatriation Act originating or excavated from BLM administered land on BLM land. Therefore, we oppose the data recovery proposed on BLM land under current BLM procedures. Enclosed are copies of our April 3, 2002, letter to BLM Director Kathleen Clarke and our July 24, 2002, letter to Secretary of the Interior Gale A. Norton, which state our opposition to this policy.

We understand the Federal Highway Administration (FHWA) will be the lead agency for the Environmental Impact Statement for this proposal. And therefore, in order for the Hopi Tribe

P.O. BOX 123 — KYKOTSMOVI, AZ — 86039 — (520) 734-3000

04/04/03 08:09 FAX 520 734 2331

Cultural Preserv

03

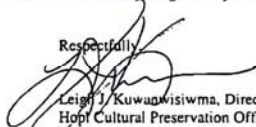
Susan G. Miller  
December 26, 2002  
Page 2

to assist the FWHA and BLM in fulfilling their mandatory requirements under the National Historic Preservation Act, the Archaeological Resources Protection Act, the Native American Graves Protection and Repatriation Act, and BLM's policy on tribal consultations, the Hopi Cultural Preservation Office requests consultation with the FWHA, UDOT, and BLM to discuss the proposed draft *Memorandum of Agreement, and repatriation and disposition of human remains and associated objects culturally affiliated to the Hopi Tribe* that may be discovered as a result of this project.

And we therefore request that the Federal Highway Administration, in taking the lead for consultations on this project pursuant to the National Historic Preservation Act, facilitate this request in order to resolve these issues prior to proceeding with this proposal. To address our concerns and questions, we reiterate our 1999 invitation to Montgomery Archaeological Consultants, and extend that invitation to FWHA, UDOT, and BLM, to meet in Kykotsmobi to discuss this proposed project.

Please contact Lanell Yeowtewa at 928-734-3612 to confirm and appointment. If you have any questions or need additional information, please contact Clay Hamilton or Terry Morgart at the Hopi Cultural Preservation Office. Thank you again for your consideration.

Respectfully,

  
Leigh J. Kuwagawisiwma, Director  
Hopi Cultural Preservation Office

Enclosures: May 25, 1999, letter to Montgomery Archaeological Consultants  
April 3, 2002, letter to BLM Director Kathleen Clarke  
July 24, 2002, letter to Secretary Norton

cc: John Fritz, Montgomery Archaeological Consultants, 167 D Street, Salt Lake City, Utah 84103  
Greg Punske, Utah Division, FHWA, 2520 West 4700 South, Suite 9A, Salt Lake City, UT 84118-1847  
Utah State Historic Preservation Office  
A. Jerry Meredith, Manager, BLM, Cedar Field Office  
Clay Hamilton, Hopi Cultural Preservation Office  
Sally Wisely, State Director, BLM  
Garth Portillo, BLM Utah State Office

C-12.1



**Southern Corridor**  
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Public Hearing Public Comment Form

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☒ Newspaper Announcement   ☐ Web Site   ☐ Invitation   ☐ Flyer  
☐ Other \_\_\_\_\_

① Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support? A NEW 4 LANE HIGHWAY FROM 1-15 MILE POST 2 TO GO EAST THEN N.E. TO HURRICANE AT ABOUT 3800 WEST GO OVER A NEW BRIDGE AT THE VIRGIN RIVER AND CONNECT TO A NEW ON & OFF RAMP ON 1-15 BETWEEN LEES & SILVER REEF.

② Which alternative do you prefer and why? I RECOMMEND MY COMMENT ABOVE, #1.

③ Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately. NOTHING IN THE WAY, GO AHEAD.

④ Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns? YES

⑤ What other transportation projects should UDOT explore in the future? MAKE ANOTHER 4 LANE ROAD NORTH OF S.R. 9 THROUGH HURRICANE. ALSO WIDEN THE ROAD FROM 1-15 M.P. 27 THROUGH TONQUERVILLE TO LA VERKIN.

COMMENT  
NUMBER

C-13

C-13.1

C-13.2

**Southern Corridor**  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form

Additional comments (attach additional sheets if necessary):

SOUTHERN UTAH IS GROWING TO BE A BIG CITY.  
WE NEED MANY ROADS

Name: R. J. Smith "PEARL HARBOR SURVIVOR"  
Organization: NONE  
City, State, Zip: HURRICANE - UTAH 84737  
Phone Number: 635-7868  
Would you like to be added to our mailing list? ☒ Yes ☐ No

Leave this comment form in the drop box,  
mail it to the address at right, or comment online at  
[www.udot.utah.gov/sc](http://www.udot.utah.gov/sc). All comments must be received  
by May 30, 2003.

Southern Corridor Project  
HDR Engineering, Inc.  
3995 South 700 East, Suite 100  
Salt Lake City, UT 84107

COMMENT  
NUMBER

C-13  
(cont'd)

C-13.3



COMMENT  
NUMBER

C-14

COMMENT  
NUMBER

C-14  
(cont'd)



Southern Corridor  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



MAY 07 2003

Please tell us how you found out about this public hearing.

- ☒ Newspaper Announcement   ☐ Web Site   ☐ Invitation   ☐ Flyer  
☐ Other \_\_\_\_\_

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support? \_\_\_\_\_

Which alternative do you prefer and why? THE 2800 WEST CONNECTION, BECAUSE THIS ROUTE WOULD LIKELY CONNECT TO THE HALL ROAD AND COULD DIVERT SOME TRAFFIC FROM SR-9. I AM A BUSINESS IN THE HURRICANE INDUSTRIAL PARK (2260 WEST) AND TRYING TO GET ONTO SR-9 EAST BOUND AT 2260 WEST IS LIKE TAKING YOUR LIFE IN YOUR HANDS. THERE IS TOO MUCH TRAFFIC ON SR-9!!!  
Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately. NONE

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns? O.K.

What other transportation projects should UDOT explore in the future?  
Anything that would make it easier to get from 331N 2260 West into town - connecting 600 N. from 2260 W. to 200 W. would help.  
Also, completely off the subject, a paved road from Mineville to Modena, through Lund. (This is the only unpaved section between Denver and San Francisco.)

C-14.1

C-14.2



Southern Corridor  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



Additional comments (attach additional sheets if necessary):

I AM DISAPPOINTED THAT THE OPTION OF FOLLOWING THE UTAH, ARIZONA BORDER, UP THE HONOLULU TRAIL AND CONNECTING TO NEAR COLORADO CITY IS NO LONGER BEING CONSIDERED.  
NONE OF THE CURRENT OPTIONS OFFER ANY REAL ADVANTAGE OVER THE CURRENT I-15 TO SR-9 ROUTE FOR AN EAST-WEST TRAVELER.  
THE CURRENT THREE OPTIONS LOOK LIKE THEY ARE INTENDED TO HELP THE STATE STREET BUSINESS IN HURRICANE, BUT OFFER NO ADVANTAGE TO THE TRAVELER.

Name: CHARLES REEVE  
Organization: HURRICANE CITIZEN, OWNER HURRICANE ELECTRONICS, INC.  
City, State, Zip: HURRICANE, UTAH 84737  
Phone Number: 435-635-9412 E-mail: CREEVE@HURRICANE-ELECTRONICS.COM  
Would you like to be added to our mailing list? ☒ Yes   ☐ No

Leave this comment form in the drop box, mail it to the address at right, or comment online at [www.udot.utah.gov/sc](http://www.udot.utah.gov/sc). All comments must be received by May 30, 2003.

Southern Corridor Project  
HDR Engineering, Inc.  
3995 South 700 East, Suite 100  
Salt Lake City, UT 84107

C-14.3

C-14.4

C-14.5

## Southern Corridor Final EIS

COMMENT  
NUMBER

C-16  
(cont'd)

C-16.3



**Southern Corridor**  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



Additional comments (attach additional sheets if necessary):

PROVIDING QUICK AND QUALITY ACCESS TO THE  
PORT PLANE INDUSTRIAL PARK IS THE BEST WAY MOST  
LIKELY WAY TO INCREASE WASHINGTON, CTY TAX GROWTH  
AND TAX BASE THAT WILL BENEFIT ALL OF THE  
COUNTY AND HELP PAY FOR THE COSTS OF  
THE SOUTHERN CORRIDOR AND NEW AIRPORT.

Name: RAY ROSENTHAL  
Organization: COLLIERS UTAH, SUITE 103 335 E. ST. GEORGE BLVD.  
City, State, Zip: ST. GEORGE, UTAH 84710  
Phone Number: (435) 673-7111 E-mail: rosenthal@intwest.com  
Would you like to be added to our mailing list? ☒ Yes ☐ No

Leave this comment form in the drop box,  
mail it to the address at right, or comment online at  
[www.udot.utah.gov/sc](http://www.udot.utah.gov/sc). All comments must be received  
by May 30, 2003.

Southern Corridor Project  
HDR Engineering, Inc.  
3995 South 700 East, Suite 100  
Salt Lake City, UT 84107



**Southern Corridor**  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



Please tell us how you found out about this public hearing.

☒ Newspaper Announcement ☐ Web Site ☐ Invitation ☐ Flyer  
☐ Other \_\_\_\_\_

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support? SHORTEST ROUTE

Which alternative do you prefer and why? I THINK THE SHORTEST  
ROUTE WOULD ACCOMPLISH THE ALTERNATE  
ROUTE TO THE AIRPORT & THE ARIZ. BORDER  
THE MIDDLE ROUTE WOULD BE MY SECOND  
CHOICE - IT WOULD BE HARDER TO DEAL  
WITH OUTLAW RIDGE THOUGH.

Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.

NA

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns?

YES

What other transportation projects should UDOT explore in the future?



DON'T KNOW

COMMENT  
NUMBER

C-17

C-17.1



	COMMENT NUMBER		COMMENT NUMBER	
 <p style="text-align: center;"><b>Southern Corridor</b> Draft Environmental Impact Statement (DEIS) Public Hearing Public Comment Form</p> <p style="text-align: right;">HDR</p> <hr/> <p>Please tell us how you found out about this public hearing.</p> <p><input checked="" type="checkbox"/> Newspaper Announcement    <input type="checkbox"/> Web Site    <input type="checkbox"/> Invitation    <input type="checkbox"/> Flyer <input type="checkbox"/> Other _____</p> <p>Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support? <u>SHOREFEST ROUTE</u></p> <hr/> <p>Which alternative do you prefer and why?</p> <hr/> <p>Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.</p> <hr/> <p>Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns?</p> <hr/> <p>What other transportation projects should UDOT explore in the future?</p> <hr/>	C-18	 <p style="text-align: center;"><b>Southern Corridor</b> Draft Environmental Impact Statement (DEIS) Public Hearing Public Comment Form</p> <p style="text-align: right;">HDR</p> <p style="text-align: right; color: red;">MAY 08 2003</p> <hr/> <p>Please tell us how you found out about this public hearing.</p> <p><input checked="" type="checkbox"/> Newspaper Announcement    <input type="checkbox"/> Web Site    <input type="checkbox"/> Invitation    <input checked="" type="checkbox"/> Flyer <input type="checkbox"/> Other _____</p> <p>Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support?</p> <p><u>If reference) to that portion of the SC running on the 24 section line through section 24 up to section 113 and more specifically (sp) that portion of the SC on the 24 line that is located close to where the 24 line intersect section 24 and section 13 I would prefer to see the radius... the curve... Which alternative do you prefer and why? The turn in the SC place closer to and preferably right over that point of intersection.</u></p> <p><u>Sincerely Doug Klein 652-957-619-2499</u></p> <p><u>Also viewing the layout on display depicting the SC, I assume the center of the SC is low tiered Vi line -</u></p> <p>Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.</p> <p><u>I am also interested in bridge road considerations along the SC that will provide access to adjoining properties. How is that handled? Is it handled within the existing proposed corridor?</u></p> <p>Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns?</p> <p><u>Thank You</u> <u>Douglas Klein</u></p> <p>What other transportation projects should UDOT explore in the future?</p> <hr/>	C-18.1	<p style="text-align: right;">C-19</p> <p style="text-align: right;">C-19.1</p> <p style="text-align: right;">C-19.2</p>

COMMENT  
NUMBER

C-20

C-20.1

COMMENT  
NUMBER

C-20  
(cont'd)

C-20.2



Southern Corridor  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



Please tell us how you found out about this public hearing.

- ☒ Newspaper Announcement   ☐ Web Site   ☒ Invitation   ☐ Flyer  
☐ Other \_\_\_\_\_

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support?

Which alternative do you prefer and why? 3400 W. - Better visibility for the off ramp & less construction cost than 2800 W. with the turn in the road at 4300 West, it may be dangerous

Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns? It was good, but I prefer a presentation with questions & answers to follow

What other transportation projects should UDOT explore in the future?



Southern Corridor  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form







Additional comments (attach additional sheets if necessary): As expressed previously, I'm still concerned about signing. No signs (private or state) should be posted to direct traffic to Zion National Park from the South or to Mesquite, NV, from the East, effectively bypassing St. George city & Washington City. This could have an adverse effect on all businesses.

Name: Ryden W. Hower  
Organization: Best Westerns of St. George  
City, State, Zip: St. George, UT 84778  
Phone Number: 435 673 4884 E-mail: rhower@bestwestern.com  
Would you like to be added to our mailing list? ☒ Yes ☐ No

Leave this comment form in the drop box, mail it to the address at right, or comment online at [www.udot.utah.gov/sc](http://www.udot.utah.gov/sc). All comments must be received by May 30, 2003.

Southern Corridor Project  
HDR Engineering, Inc.  
3995 South 700 East, Suite 100  
Salt Lake City, UT 84107

 <div style="text-align: center;"> <b>Southern Corridor</b>            Draft Environmental Impact Statement (DEIS)            Public Hearing Public Comment Form         </div> <div style="text-align: right;">             MAY 19 2003         </div>	COMMENT NUMBER	 <div style="text-align: center;"> <b>Southern Corridor</b>            Draft Environmental Impact Statement (DEIS)            Public Hearing Public Comment Form         </div> <div style="text-align: right;">  </div>	COMMENT NUMBER
<p>Please tell us how you found out about this public hearing.</p> <p> <input type="checkbox"/> Newspaper Announcement           <input type="checkbox"/> Web Site           <input type="checkbox"/> Invitation           <input type="checkbox"/> Flyer           <input type="checkbox"/> Other _____       </p> <p>Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support? <u>I support the project! I'm not sure what you're asking by elements</u></p> <p>Which alternative do you prefer and why? <u>Alternative at 3400 West. Better location of intersection on SR-9. Access on &amp; off SR-9 is a big issue. This location provides best horizontal sight distance</u></p> <p>Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.</p> <p>Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns? <u>Yes</u></p> <p>What other transportation projects should UDOT explore in the future? <u>Northern Belt route from New M.P. 13 interchange west to Bluff street</u></p>	<div style="text-align: center;">C-21</div> <div style="text-align: center;">C-21.1</div>	<div style="text-align: center;">C-21</div> <div style="text-align: center;">(cont'd)</div> <div style="text-align: center;">C-21.2</div> <p>Additional comments (attach additional sheets if necessary): <u>The project is a necessary project. Many routes have been studied on those seem to be the most feasible. I do not support the 2800 West alternative as I don't want the road to go around the Sand Hollow Reservoir site. This may tend to cut off future recreational opportunities as well as other opportunities. Access needs to be strictly controlled and limited. Project should move forward as soon as possible and no later than the airport construction.</u></p> <p>Name: <u>David J. Demas</u></p> <p>Organization: <u>City of St. George</u></p> <p>City, State, Zip: <u>175 E. 200 N, St. George, UT. 84790</u></p> <p>Phone Number: <u>435-674-9287</u> E-mail: <u>ddemas@infowest.com</u></p> <p>Would you like to be added to our mailing list? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>           Leave this comment form in the drop box,            mail it to the address at right, or comment online at  <a href="http://www.udot.utah.gov/sc">www.udot.utah.gov/sc</a>. All comments must be received            by May 30, 2003.         </p> <p style="text-align: right;">           Southern Corridor Project            HDR Engineering, Inc.            3995 South 700 East, Suite 100            Salt Lake City, UT 84107         </p>	



COMMENT  
NUMBER

C-22



**Southern Corridor**  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



Please tell us how you found out about this public hearing.

- ☒ Newspaper Announcement    ☐ Web Site    ☐ Invitation    ☐ Flyer  
☐ Other \_\_\_\_\_

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support? *It seems that it is less intense to wall life & farms.*

Which alternative do you prefer and why? *I like the 2900w Alternative.*  
*1. It comes out closer to Hurricane Center business.*  
*2. It is far safer than the other alternatives.*  
*3. It is scenic along the sandhollow houses.*  
*4. It is less destructive to existing housing & farms such as floor tile & the person asked.*

Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately. *I am not aware of any.*

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns? *Yes. I had every question answered properly and the representative was very knowledgeable.*

What other transportation projects should UDOT explore in the future? *They should work on a National Route around St George to Santa Clara & Enterprise.*

C-22.1

C-22.2



**Southern Corridor**  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



Additional comments (attach additional sheets if necessary); *I have long thought it would be nice to have an alternative route to the west. I also think that there should be a way for people from the east any circumvent the narrow bridge of Hurricane. I don't know all that well should be able to by pass the restrictions of the towns and allow the traffic to safely flow around our down town areas.*

Name: *James B Blackman*  
Organization: *Board of Adjustment - Jellerhu City*  
City, State, Zip: *Jellerhu City, UT 84107*  
Phone Number: *635 4512* E-mail: *JIM.BBLACKMAN@jellerhu.net*  
Would you like to be added to our mailing list? ☒ Yes ☐ No

Leave this comment form in the drop box, mail it to the address at right, or comment online at [www.udot.utah.gov/sc](http://www.udot.utah.gov/sc). All comments must be received by May 30, 2003.  
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HDR Engineering, Inc.  
3995 South 700 East, Suite 100  
Salt Lake City, UT 84107

COMMENT  
NUMBER

C-22  
(cont'd)

C-22.3

**Southern Corridor**  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form

MAY 12 2003

Please tell us how you found out about this public hearing.

☒ Newspaper Announcement ☐ Web Site ☐ Invitation ☐ Flyer  
☐ Other \_\_\_\_\_

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support? \_\_\_\_\_

Which alternative do you prefer and why? *Prefer the 4300 W alternative because it is the shortest and most direct route and also is one of the lower cost alternatives. The 3400 alternative has no benefit because the Outlaw Ridge will provide for its own traffic requirements. The 2800 W route runs through the Sand Hollow area, adding more traffic with little benefit.*

Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately. *The area involved in the three alternatives is also already developed to the extent that these considerations are of little importance.*

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns? *Yes*

What other transportation projects should UDOT explore in the future? *The traffic congestion through the old downtown Hurricane on SR-9 from 300 W to the LaVerne bridge is serious and requires some relief. An alternate route from the west side of Hurricane to SR-59 East of town would be a much needed alternative.*

COMMENT  
NUMBER

C-23

C-23.1

C-23.2

C-23.3

**Donegan, Nicole**

From: Izzo, Vincent  
Sent: Monday, May 19, 2003 6:35 AM  
To: Donegan, Nicole  
Subject: FW: Southern Corridor Draft EIS comment

> Vincent Izzo  
> HDR Engineering Inc.  
> Salt Lake City ERM Section Manager  
> email: Vincent.Izzo@hdrinc.com  
> phone: 801-281-8892  
> cell: 801-913-3346  
>

-----Original Message-----  
From: Larry Bulloch [mailto:lbulloch@infowest.com]  
Sent: Monday, May 12, 2003 8:14 AM  
To: Izzo, Vincent  
Subject: Southern Corridor Draft EIS comment

Dear Vance;

I have the following comments on the EIS:

pg. 1-6: MPO designation has taken place as well as committee reorganization.

pg. 1-9: Transit service is now provided by St. George and the transit plan is being developed, hopefully complete by the end of the summer.

pg. 1-10&1-11: Bus service has changed.

pg. 2-22: St. George Improvements need to be updated.

Thank you,

Larry Bulloch

COMMENT  
NUMBER

C-24

C-24.1

C-24.2

C-24.3

C-24.4

1



COMMENT  
NUMBER

C-25

C-25.1



**Southern Corridor**  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



Additional comments (attach additional sheets if necessary):

Southern Corridor  
NO to 3400 West alternative  
It will bring noise, pollution, accidents  
near my home

Name: Jacqueline DUBOIS  
Organization: \_\_\_\_\_  
City, State, Zip: Hurricane, UT 84737  
Phone Number: \_\_\_\_\_ E-mail: \_\_\_\_\_  
Would you like to be added to our mailing list? Yes ☐ No ☐

Leave this comment form in the drop box,  
mail it to the address at right, or comment online at  
[www.udot.utah.gov/sc](http://www.udot.utah.gov/sc). All comments must be received  
by May 30, 2003.

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Salt Lake City, UT 84107



**Southern Corridor**  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



Please tell us how you found out about this public hearing.

☐ Newspaper Announcement ☐ Web Site ☐ Invitation ☐ Flyer  
☒ Other NEIGHBOR

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support? 2800 WEST ALTERNATIVE

THE ELEMENTS I SUPPORT FOR MY REASONING ARE PRINCIPALLY THE  
ADVANTAGES & DISADVANTAGES OF THE ALTERNATIVE ROUTE. I THINK  
THEY OUTWEIGH BOTH OF THE OTHERS WITH EXCEPTION TO THE COST, BUT  
I BELIEVE EVEN THAT WILL BE AN ADVANTAGE IN THE FUTURE BUILDING  
A BYPASS ROUTE FROM THE SOUTHEAST CORNER OF SAN JUAN RESERVOIR TO THE COLORADO CITY  
WYOMING, GOING INTO ARIZONA.  
Which alternative do you prefer and why? 2800 WEST ALTERNATIVE  
EITHER OF THE OTHER 2 ALTERNATIVES WOULD CAUSE ADDITIONAL  
CONGESTION AREAS ON SR 9, WHICH IS ONE OF THE FEW TRAFFIC  
RELEASES OFF I-15

Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.

I KNOW OF NONE

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns? I THINK YOU DID A  
FINE JOB OF GIVING US INFORMATION. I'VE HEARD A LOT ABOUT THIS  
PROJECT, BUT NEVER UNDERSTOOD IT UNTIL I READ YOUR SUMMARY.

What other transportation projects should UDOT explore in the future?  
I WOULD LIKE AVAILABLE OUTLETS FROM ST GEORGE TO FREEMAN (I-15)  
THE ROAD FROM SUNSET BLVD IN ST GEORGE TO I-15 THROUGH  
MOUNTAINS - COMING OUT CLOSE TO LION TURN OFF ON SR 9

COMMENT  
NUMBER

C-26

C-26.1

C-26.2

	COMMENT NUMBER		COMMENT NUMBER
<div data-bbox="121 305 222 370"> </div> <div data-bbox="283 293 701 370"> <p><b>Southern Corridor</b> Draft Environmental Impact Statement (DEIS) Public Hearing Public Comment Form</p> </div> <div data-bbox="772 310 850 349"> </div> <p>Additional comments (attach additional sheets if necessary):</p> <p>No. to the 3400 West Alternative</p> <p>→</p> <p>→</p> <p>Name: <u>JACK M FARNWORTH</u>  Organization: _____  City, State, Zip: <u>Hurricane</u>, <u>UT</u> <u>84737</u>  Phone Number: <u>435-635-4311</u> E-mail: _____  Would you like to be added to our mailing list? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Leave this comment form in the drop box,  mail it to the address at right, or comment online at  <a href="http://www.udot.utah.gov/sc">www.udot.utah.gov/sc</a>. All comments must be received  by May 30, 2003.</p> <div data-bbox="562 1068 779 1144"> <p>Southern Corridor Project  HDR Engineering, Inc.  3995 South 700 East, Suite 100  Salt Lake City, UT 84107</p> </div>	<p>C-26 (cont'd)</p> <p>C-26.3</p>	<p>5/20/03</p> <p>To UDOT/HDR Engineering,</p> <p>I am opposed to the construction of the proposed southern corridor because whenever a highway is made through a pristine area, developments of houses soon line both sides of that road. Several developments have already been constructed or soon will be at points along that route.</p> <p>This is a lovely and scenic area of natural beauty which is being destroyed by unregulated development expansions. Roads open up that expansion.</p> <p>Please don't let this road be constructed.</p> <p>Jay Beacham  85 E. Center  Ivins, Ut. 84738</p>	<p>C-27</p> <p>C-27.1</p>

COMMENT  
NUMBER

C-28

C-28.1

C-28.2

COMMENT  
NUMBER

C-28  
(cont'd)

C-28.3



**Southern Corridor**  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form



MAY 27 2003

Please tell us how you found out about this public hearing.

- ☐ Newspaper Announcement   ☐ Web Site   ☐ Invitation   ☐ Flyer  
☒ Other Neighbor

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support?

Which alternative do you prefer and why? 4300 West

There is already a road plan there to Sand Hollow Reservoir

Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns?

What other transportation projects should UDOT explore in the future?

Tram Light at SR 9 and Quake Lake Estates by Chevron Station



**Southern Corridor**  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form







Additional comments (attach additional sheets if necessary):

No to the 3400 West Alternative  
It has the greatest # of relocations  
It conflicts with Quake Lake Ridge  
development.

Name: Sheldon Green Sheldon Green  
Organization: Neighbor hood  
City, State, Zip: Hurricane UT 84737  
Phone Number: 435-635-0381 E-mail: \_\_\_\_\_  
Would you like to be added to our mailing list? ☒ Yes ☐ No

Leave this comment form in the drop box, mail it to the address at right, or comment online at [www.udot.utah.gov/sc](http://www.udot.utah.gov/sc). All comments must be received by May 30, 2003.

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Salt Lake City, UT 84107

COMMENT NUMBER		COMMENT NUMBER
<div><div><div><div>Southern Corridor</div><div>Draft Environmental Impact Statement (DEIS) Public Hearing Public Comment Form</div></div><div></div></div><div><div><div>MAY 27 2003</div><div>Please tell us how you found out about this public hearing.</div><div><div><input checked="" type="checkbox"/> Newspaper Announcement</div><div><input type="checkbox"/> Web Site</div><div><input type="checkbox"/> Invitation</div><div><input type="checkbox"/> Flyer</div><div><input checked="" type="checkbox"/> Other <u>neigh Boe</u></div></div><div><div>Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support?</div><div><u>needed for growth</u></div></div><div><div>Which alternative do you prefer and why?</div><div><u>4300 WEST</u> <u>DISTANCE &amp; IMPACT</u></div></div><div><div>Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.</div><div></div></div><div><div>Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns?</div><div></div></div><div><div>What other transportation projects should UDOT explore in the future?</div><div></div></div></div></div><div><div>COMMENT NUMBER</div><div>C-29</div><div>C-29.1</div><div>C-29.2</div></div><div><div><div><div><div>Southern Corridor</div><div>Draft Environmental Impact Statement (DEIS) Public Hearing Public Comment Form</div></div><div></div></div><div><div>Additional comments (attach additional sheets if necessary):</div><div><u>NO to 3400 West Alternative</u></div></div><div><div>Name: <u>Jay &amp; Bonnie Montec</u></div><div>Organization: <u></u></div><div>City, State, Zip: <u>338 N 3510 W HURRICANE UT 84137</u></div><div>Phone Number: <u>435-635-2910</u> E-mail: <u>Montec@AOL.com</u></div><div>Would you like to be added to our mailing list? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</div><div><div>Leave this comment form in the drop box, mail it to the address at right, or comment online at <a href="http://www.udot.utah.gov/sc">www.udot.utah.gov/sc</a>. All comments must be received by May 30, 2003.</div><div><div>Southern Corridor Project HDR Engineering, Inc. 3995 South 700 East, Suite 100 Salt Lake City, UT 84107</div></div></div></div><div><div>COMMENT NUMBER</div><div>C-29 (cont'd)</div><div>C-29.3</div></div></div></div></div>		



COMMENT  
NUMBER

C-30

CITY OF HURRICANE  
147 NORTH 870 WEST  
HURRICANE, UT 84737  
435-635-2811

May 22, 2003

Southern Corridor Project  
HDR Engineering  
3995 South 700 East, Ste 100  
Salt Lake City, UT 84107

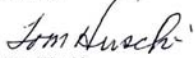
Dear UDOT,

The Hurricane City Council and Planning Commission have studied the three alternatives to moving traffic from I-15 to SR-9. For the following reasons, the City has chosen to support the 2800 West alternative through the City:

- 1). Fewer property owners involved.
- 2). Improved access to recreation sites and projected future development.
- 3). Better opportunities for east/west connections from the City.
- 4). Best location for connection to SR-9 because of safer access and proximity to the main part of the City.
- 5). Lowest number of cultural sites.

We would recommend that the connection between SR 9 and the Southern Corridor be with overpasses for a smooth transition of traffic.  
We hope the resolution of the location of the Southern Corridor through Hurricane will help move this project closer to completion. Thank you for the opportunity to offer our input on this critical decision and please continue to keep us informed as progress is made on the Southern Corridor.

Sincerely,

  
Tom Hirschi  
Hurricane City Mayor

MAY 22 2003

C-30.1

C-30.2



Southern Corridor  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form

HDR

Please tell us how you found out about this public hearing.

☐ Newspaper Announcement   ☐ Web Site   ☐ Invitation   ☒ Flyer  
☐ Other \_\_\_\_\_

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support? none

Which alternative do you prefer and why? none

let's pay for what we've got going on now first before beginning a new project.

Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately. no opinion

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns? yes

What other transportation projects should UDOT explore in the future? no opinion

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C-31

C-31.1

	COMMENT NUMBER		COMMENT NUMBER
<div data-bbox="130 315 228 375"> </div> <div data-bbox="291 302 716 380"> <p align="center"><b>Southern Corridor</b> Draft Environmental Impact Statement (DEIS) Public Hearing Public Comment Form</p> </div> <div data-bbox="787 323 865 362"> </div> <p>Additional comments (attach additional sheets if necessary):</p> <p><u>No! to 3400 West alternative</u></p> <p>→</p> <p>Name: <u>Tom Shelly</u>  Organization: <u>NONE</u>  City, State, Zip: <u>Hurricane, UT 84737</u>  Phone Number: _____ E-mail: _____  Would you like to be added to our mailing list? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Leave this comment form in the drop box,  mail it to the address at right, or comment online at  <a href="http://www.udot.utah.gov/sc">www.udot.utah.gov/sc</a>. All comments must be received  by May 30, 2003.</p> <p align="right">Southern Corridor Project  HDR Engineering, Inc.  3995 South 700 East, Suite 100  Salt Lake City, UT 84107</p>	<p><b>C-31</b> (cont'd)</p> <p><b>C-31.2</b></p>	<p>Jim Steitz  1235 E 1000 N #202  Logan, UT 84321  May 28, 2003</p> <p>FHWA Utah Division  ATTN: Gregory Punske  2520 West 4700 South, Ste 9A  Salt Lake City UT 84118</p> <p>Dear Mr. Punske,</p> <p>I write to express my strongest concern and objection to the presently conceived "Southern Corridor" to run between I-15 and State Route 9. This project is squarely at odds with any notion of sound transportation planning and development policy, and would create terrible and unacceptable impacts to the environment and quality of life in the region.</p> <p>First, this project is bound to unleash a wave of low-density development along its length, negating much of the traffic congestion purpose for the project itself. Much like the Legacy Highway would have created a net-increase in congestion over several decades, this project will induce such poorly planned development, that the long-term capacity issue in the area may be made worse through this induced demand. Indeed, the FHWA admits that each of the action alternatives would actually increase traffic congestion on seven of thirty-three segments studied versus the no-build alternative. This calls into severe question the true purpose of the project, and whether it is a wise use of taxpayer dollars, let alone a wise disposition of the extremely valuable ecological assets and lands of the area.</p> <p>Second, and most legally compellingly, this project would destroy populations of Holmgren's milkvetch, Dwarf bearclaw poppy and Siler's pincushion cactus. The federal government's projects cannot simply violate the Endangered Species Act at will. This project would be considered questionable on these grounds alone. Much as the ill-fated Legacy Highway could not simply ignore the Clean Water Act, nor can the FHWA ignore the Endangered Species Act. These plants are ecological specialists and cannot simply be relocated or receive some other sort of damage mitigation, as FHWA is prone to attempting in such high-conflict situations. The Dwarf Bearclaw Poppy, in particular, may be Utah's most endangered plant.</p> <p>Third, the FHWA, in proposing three equally bad alternatives, is trapped within the same limited range of thinking that afflicted the Legacy Highway project - the alternatives have been reduced to different road designs, rather than being truly different alternatives for meeting the project's purpose and need. This DEIS is explicitly connected to the assumption that Washington County will not use any smart growth planning, and assumes no impact from public transportation for the entirety of the project analysis horizon. This is clearly a faulty set of assumptions, and using these assumptions as the framework for alternative design and selection guarantees a flawed process and bad result. In fact, the Southern Corridor as currently envisioned, would solidify and accelerate the lack of adequate planning and smart growth policies in Washington County.</p>	<p><b>C-32</b></p> <p><b>C-32.1</b></p> <p><b>C-32.2</b></p> <p><b>C-32.3</b></p>

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C-32.4

This direct causality between the actions of FHA and the land-use situation in the area is the crucial link that FHA cannot avoid (indeed, it admits this explicitly), and which has the effect of nullifying the project's purpose and need. NEPA is clear that government agencies cannot avoid a comprehensive look at broad alternatives simply by virtue of the agency's area of purview. In other words, NEPA obliges the FHA to take a much broader look at possible alternative land-use and planning futures of the area (and the agency arrangements needed to promote those futures), not merely a few variations on where the Southern Corridor connects to State Route 9.

In conclusion, I strongly urge the FHA to withdraw this project, go back to the drawing board, and take a hard look at the long-term transportation demands it must meet, in the context of the region's land use planning, not in isolation. I also urge the FHA to pay due respect to the important ecological values of this area, including endangered species habitat, and commit to never again threatening the continued existence of some of Utah's most rare and precious life forms. No highway is worth their loss.

Sincerely,  
Jim Steitz

COMMENT  
NUMBER

C-33



MAY 29 2003

May 28, 2003

Southern Corridor Project  
HDR Engineering  
3995 South 700 East, Ste 100  
Salt Lake, UT 84107

Subject: Southern Corridor Project Comments

Dear Mr. Hanson,

Alliance Consulting is a full service land development and consulting firm representing several major land owners affected by the Southern Corridor project. We currently have land development contracts with State Institutional and Trust Lands Administration, Dave Wilkie, who is representing several private land owners, and the Washington County Water Conservancy District all in the Sand Hollow Region. We have a pending contract with Nick Berg representing Copper Rock, also in the Sand Hollow Region.

SITLA, the Conservancy District, and Dave Wilkie have formed a coalition to complete certain aspects of the land planning. This land planning is currently at a preliminary stage, but as the attached map shows, all of these owners will be significantly impacted by the Southern Corridor project.

Currently, information is being gathered, mapping completed, and plans formulated that will allow a base for commenting on the Southern Corridor routing and access points. We expect to be able to deliver a presentation on the results of the planning within 30 days and request that these disclosures be accepted as our comments and fulfill the requirements of the Public Hearing and Comment stage due May 30. The coalition desires to fully cooperate with UDOT so that the development of these plans will help solidify the goals and objectives of the Southern Corridor project.

We would like to meet with UDOT personnel to receive their input in this process and will be contacting them in the near future. If you have any questions, please call me at (435) 673-8060.

Sincerely,

  
Deloss S. Hammon, P.E.  
Principal Engineer

cc: Don Leavitt, SITLA  
Ron Thompson, Washington County Conservancy District  
Dave Wilkie  
Nick Berg, Copper Rock  
Robert Dowell, UDOT

2303 North Coral Canyon Blvd., Suite 201, Washington City, Utah 84780-0576  
P) 435.673.8060 F) 435.673.8065

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<p>Page 1 of 1</p> <p><b>Donegan, Nicole</b></p> <hr/> <p><b>From:</b> mendenhall [rtvsmendenhall@lvcn.com]  <b>Sent:</b> Friday, May 30, 2003 8:54 PM  <b>To:</b> Donegan, Nicole  <b>Cc:</b> Jerry Spilsbury  <b>Subject:</b> southern corridor</p> <p>I appreciate the work and effort that has gone into assessing the impact of this thoroughfare and support the recommendations that you are making. However, 2800 west route runs through approximately 3 miles of our property. If this route is chosen, we would require an interchange at least every mile, sound walls installed, and landscape enhancements to reduce the environmental and aesthetic impact of this thoroughfare on the future development of our property.</p> <p>A.R. Spilsbury Family Enterprises  Vyonne S. Mendenhall  General Partner  1701 Dunerville St.  Las Vegas, NV 89146-1219  702.878.6175  702.877.4874 FAX  702.326.2006 CEL</p>	C-34	<p><b>Punske, Gregory</b></p> <hr/> <p><b>From:</b> jdcjc@redrock.net [hubsmtg.gwhub."jdcjc@redrock.net"] on behalf of hubsmtg.gwhub."jdcjc@redrock.net"  <b>Sent:</b> Friday, May 30, 2003 11:04 PM  <b>To:</b> Punske, Gregory  <b>Subject:</b> DEIS for Southern Corridor</p> <p>Dear Mr. Punske,</p> <p>My wife and I are grateful for the opportunity to comment on the thoroughness or lack of same of the Southern Corridor DEIS. This draft displays considerable evidence of insufficient planning regarding the impact of the Corridor on water conservation, endangered species and budgets of the affected municipalities.</p> <p>With regard to water problems not addressed, we suggest that there are current demands for more water than available. It is no longer reasonable to assume that a five-year drought will be broken within a foreseeable number of years. The publicity generated by the proposed project will encourage accelerated interest on the part of commercial, industrial and residential growth. This would create a financial boon for those owning property adjacent to the Corridor, which fact we suggest may be the prime mover for the highway. While a few would prosper, the current residents would be subjected to increased restrictions on water quantity and quality and increased cost. The construction of a highway that may, when completed, produce commute-time savings of \$4 should be ruled out on that statistic alone. Tax payers should not be asked to give up thousands (tens of thousands or more?) of acres of open land in exchange for the expenditure of a quarter of a billion dollars and more poorly-planned, low-density sprawl. The proposed project is not necessary!</p> <p>The barely cursory attention given to the unnecessary destruction of the Dwarf Bear Claw Poppy is not sufficient to your responsibility for meeting requirements of the Endangered Species Act.</p> <p>The DEIS purports to present four alternatives but the reality is that there are two - build or no build. The commonality of nearly all the lengths of the supposed three build alternatives makes it farcical to present them as significantly different.</p> <p>As to the impact of this proposal on the income and expenditures of the cities of St. George, Washington and Hurricane, we posit that experience testifies that tax benefits given to entice commercial and industrial entities into the area will always put pressure on the municipal government and thus on the residents. Significant increase in population leads to increased diversity in services demanded; hence increased taxes.</p> <p>A project, such as the Southern Corridor, designed to benefit a few while working to the overall detriment of the vast majority should be abandoned!</p> <p>Very truly yours,</p> <p>John D. and Constance J. Clemens</p> <p>296 E 900 S #19  St. George, UT 84770  435-688-9725</p>	C-35
	C-34.1		C-35.1
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			C-35.3
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			C-35.5



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(cont'd)



The Nature Conservancy of Utah  
559 East South Temple  
Salt Lake City, UT 84103

tel [801] 531.0999  
fax [801] 531.1003  
nature.org

09 July 2003

Gregory Punske  
FHWA Utah Division  
2520 West 4700 South, Suite 9A  
Salt Lake City, UT 84118

Dear Mr. Punske:

This letter is in response to your request for comments on the Southern Corridor Draft Environmental Impact Study (Draft EIS).

Generally, our comments emphasize the need for a thorough analysis of rare plant issues within the project area.

The Nature Conservancy has conducted extensive evaluations and conservation planning for our rich biological diversity in Utah. Using the best available science, we have taken specific actions in the state to protect the viability of all native plants, animals, and natural communities.

These actions in the Mojave Desert ecosystem and other areas of Washington County include work such as protecting rare plant habitat in our Dwarf Bearclaw Poppy Preserve and participating in the development of the Washington County Habitat Conservation Plan to protect desert tortoise and other animals. Taking a more comprehensive look at all of the components of biological diversity in the area and their conservation needs, our attention has been increasingly focused on rare plant issues in and around your project area (Mojave Desert Ecoregional Planning Team, 2001).

The Southern Corridor Draft EIS raises some concerns regarding adverse impacts to three rare plants, specifically the dwarf bearclaw poppy, Holmgren milkvetch, and Siler cactus.

**Issues of concern:**

**1) Any loss of habitat does jeopardize the existence of these three plants.** As recognized by the U.S. Fish and Wildlife Service (USFWS) in the Draft EIS, Section 4.14, page 4-86, the Southern Corridor will likely have adverse effects on

the bearclaw poppy (*Arctomecon humilis*), an Endangered plant; Holmgren milkvetch (*Astragalus holmgreniorum*), an Endangered plant; and Siler cactus (*Pediocactus silerii*), a Threatened plant. Based on expert opinion by Dr. Renée Van Buren and Dr. Kimball T. Harper, we agree with that determination. The Southern Corridor will adversely affect these three Federally listed plant species. However, we disagree with USFWS's biological opinion, page 4-87, that the construction of the highway "will not jeopardize the continued existence of the Holmgren milkvetch, bearclaw poppy, or Siler cactus provided that the active conservation (mitigation) measures outlined below and in the biological opinion are taken." According to Dr. Harper and Dr. Van Buren, botanists and experts for these three plant species, any loss of habitat will jeopardize the continued existence of the Holmgren milkvetch, bearclaw poppy, and Siler cactus (Van Buren, Harper, pers. comm., 2003). This opinion is held for the following reasons:

- The size and distribution of existing populations are already alarmingly small.
- All existing populations are critical to provide genetic diversity necessary to adapt to existing and future environmental conditions.
- Loss of habitat means not only a loss of the existing plants, but also the loss of the seed bank. The seed bank provides critical genetic diversity needed for survival and adaptation. Each species' future lies in the protection of the seed bank which is well-adapted to desert conditions. According to Dr. Kimball Harper, the seed bank can contain about 100 times the number of plants visible on the surface (Harper, pers. comm., 2003).
- Anything that further reduces the genetic diversity of these three plant species would impact the rare plant populations (Van Buren, Harper, pers. comm. 2003). This includes any further reduction or division of existing populations.
- Plant numbers alone is not a safe criterion for an evaluation of reproductive health of the poppy. Population density strongly influences the poppy's reproductive success (Harper, et al., 2001).
- As recognized in the Draft EIS, page 4-98, the bearclaw poppy "habitat loss has occurred over the last 30 years as a result of urban growth, increased use of OHVs, and other recreation." For these same reasons, further habitat loss will continue as extensive development plans exist for this area. Every attempt should be made to prevent further habitat loss.

USFWS has not included all of the available public information about plant populations in their assessment. Therefore, we express concern over the accuracy of the Service's Non-Jeopardy Opinion. Information published over the last decade does not support the conclusion stated in the Opinion. The project demonstrates a serious negative impact to the survival of these three plant species. They could be gone in 2-20 years (Harper, pers. comm., 2003).

Additionally, there is reasonable doubt that the "active conservation (mitigation) measures outlined .... and in the biological opinion" will be taken. To date, the Bureau of Land Management (BLM) has certainly taken some measures to

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<p>protect these rare plants on public lands. For example, "no ORV signs" have been posted at Warner Ridge and the Red Bluff area has been fenced to protect bearclaw poppy habitat. However, no citations have been issued for ORV incursions and the Red Bluffs habitat is considerably damaged from off-trail bicycle use. The White Dome area, significant habitat for the bearclaw poppy and the Siler cactus, is state owned. There is no guarantee of protection for these properties (see number 3 on mitigation, below).</p> <p><b>2) Plant habitat for these three species needs to be redefined.</b> The biological assessment for the Southern Corridor (Intermountain Ecosystems 2002) was not available for our review in the Draft EIS. When was this survey completed? Is this document available for comment? It should be evaluated by experts such as Dr. Harper and Dr. Van Buren.</p> <p>Existing information in the Draft EIS on plant habitat is inadequate. For example, on page 4-87, 4.14.1.2, it is mentioned that "approximately one poppy and 6.2 acres of habitat" would be adversely affected. However, the same area that yielded "one poppy" in the year of that survey could contain one hundred or more seedlings during a "wet" year. A single year plant survey for each of these three species is inadequate in identifying habitat. The last few years have been drought years, resulting in few visible plants. In contrast, a year of high spring precipitation would yield a far greater number of plants over a wider area, thus more accurately defining the extent of the plants' habitats and available seed banks. According to Dr. Kimball Harper, the seed bank could contain up to 100 times the number of individuals viewed above ground (pers. comm., 2003). It is suggested that the numerous plant surveys that have been conducted for the past 15 years be consulted to define habitat for each of these three species. Sources for past plant surveys include Dr. Harper, Dr. Van Buren, BLM, and State of Utah agencies (2003).</p> <p><b>3) All existing habitat is critical to the survival of these three plant species. Mitigation in regard to these Federally Listed plants is without meaning or practical application.</b> All existing habitat is critical to the survival of these three plant species. Mitigation in regard to these Federally Listed plants is without meaning or practical application. Further, our discussion of the rare plant issue needs to be framed around the seed banks rather than on individual plants.</p> <p>Mitigation measures mentioned in the Draft EIS will not accomplish meaningful protection for a number of reasons. First, the Draft EIS offers one-for-one replacement (of habitat) in adjacent areas. This would still result in a net loss of poppy, milkvetch and cactus habitat (and genetic diversity) when so little remains. All existing habitat needs to be protected.</p> <p>Additionally, if this "one-for-one replacement in adjacent areas" is suggesting that adjacent areas could be become habitat through transplantings or seeding, it</p>	<p><b>C-36</b> <b>(cont'd)</b></p> <p><b>C-36.2</b></p> <p><b>C-36.3</b></p> <p><b>C-36.4</b></p>	<p>demonstrates a lack of understanding of the biology of these rare plants. For example, to date no bearclaw poppies have been successfully transplanted or germinated. <i>In situ</i> conservation is critical for the poppy for many reasons: dependence upon soils of a specific geologic formation, a long-lived seed bank which germinates in <i>that particular area</i>, seeds which cannot be germinated or plants transplanted, and a necessary population density to ensure cross-pollination. Dependence on local pollinators (bees) and seed dispersers (ants) strengthens this case. The habitat for these plants exists where the plants and seed banks currently exist. Any loss of habitat jeopardizes the existence of these three species (Van Buren, Harper, pers. comm., 2003).</p> <p>Fencing of habitat is also listed as a mitigation measure. There are no guarantees of fences being built or maintained. The Red Bluff bearclaw poppy population has been fenced, but bicycles are allowed in the area and considerable habitat has been damaged. Warner Ridge, an Area of Critical Environmental Concern (ACEC), has never been fenced. White Dome, important habitat for the poppy and Siler cactus, is school trust lands. They are not legally obligated to fence this habitat and can choose to sell these properties.</p> <p><b>4) The Southern Corridor is one of several projects which will result in rare plant habitat loss. Reassess all development plans for the area to evaluate the cumulative adverse effects on these rare plants.</b> The Draft EIS recognizes the adverse effects of the proposed Southern Corridor on these plant species. However, there are considerable development plans for this area: a new airport, an industrial park near White Dome, home development, a possible realignment of River Road through White Dome, other interchanges and roads, and more. These other projects will also impact these three rare plants, thus increasing the overall impact of any habitat loss.</p> <p>We suggest a master planning process, coordinating Southern Corridor planning with Washington County planning, to accurately assess all adverse effects on the existing rare plant populations.</p> <p>In closing, we would like to reiterate several issues for clarification and further work in the Final Environmental Impact Statement:</p> <ul style="list-style-type: none"> <li>• We would like to see a more complete analysis of project alternatives, including a build alternative that more fully explores a non-automobile transportation solution.</li> <li>• We would like to see an alignment option brought forward in your analysis that avoids the habitats occupied by the Endangered and Threatened plants.</li> <li>• In the next iteration of the EIS, we would like to see a more complete presentation and analysis of the data for rare plants. This would include habitat and population trend data from the last 15 years and the incorporation</li> </ul>	<p><b>C-36</b> <b>(cont'd)</b></p> <p><b>C-36.5</b></p> <p><b>C-36.6</b></p> <p><b>C-36.7</b></p> <p><b>C-36.8</b></p> <p><b>C-36.9</b></p>

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of more recent survey data that has become available, so that planners and the Public can use the best science available for the Environmental Consequences analysis. This would also include careful consultation with experts, including biological and survey information from BLM, Drs. Van Buren and Harper, data residing with State agencies, and consultation with experts regarding plant pollinators.

- We would like to see a more sophisticated analysis of rare plant conservation issues based on population dynamics and seed bank protection.
- We would like for Utah Department of Transportation to reinstate Section 7 Consultation with the USFWS based on existing information that was missed in this analysis as well as newly available rare plant information.
- The USFWS is in the process of revising the Recovery Plan for the bearclaw poppy and creating the Recovery Plan for the Holmgren milkvetch. These federal documents should be consulted in advance of the Final EIS. Additionally, we strongly recommend USFWS Critical Habitat Designations for the three plant species considered in these comments, necessary measures for adequate protection of the listed species.
- We think that it would be appropriate to conduct more rigorous regional planning by the St. George Metropolitan Planning Organization. This would include a master planning process that evaluates the full scope of road, commercial and residential development projects currently underway and proposed for the near future and those cumulative adverse effects on these rare plants.

Thank you for the opportunity to review the Draft EIS for the Southern Corridor Project. We hope the issues that we have raised will be helpful in your evaluation of the proposed project.

Sincerely,



Joel M. Peterson  
West Desert Regional Director



Elaine York  
Conservation Programs Manager

cc:  
Southern Corridor Project  
HDR Engineering  
3995 South 700 East  
Suite 100  
Salt Lake City, UT 84107

COMMENT  
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Literature Cited

**Dr. Kimball T. Harper.** 2003. . Utah Valley State College, Biology Department, 800 West University Parkway, Orem, UT 84058.

**Dr. Renée Van Buren.** 2003. . Utah Valley State College, Biology Department, 800 West University Parkway, Orem, UT 84058.

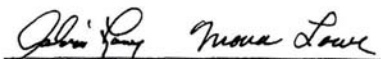
**Harper, K. T., Renée Van Buren and Zachary T. Aanderud (2000).** September 2001. The Influence of Interplant Distance and Number of Flowers on Seed Set in Dwarf Bear-Poppy (*Arctomecon humilis*). Pages pp. 105-109 in Southwestern Rare and Endangered Plants: Proceedings of the Third Conference, September 25-28, 2000, Flagstaff, Arizona, RMRS-P-23. Rocky Mountain Research Station, Forest Service, United States Dept. of Agriculture.

**Mojave Desert Ecoregional Planning Team.** 2001. Ecoregion-Based Conservation in the Mojave Desert. The Nature Conservancy of Nevada. In House. 97 pp., Maps, + 7 appendices.

**Van Buren, R. and Kimball T. Harper.** 2003. Demographic and Environmental Relations of Two Rare Astragalus Species Endemic to Washington County, Utah: *Astragalus holmgreniorum* and *A. ampullarioides*. Western North American Naturalist **63**(No. 2): 236-243.

**Van Buren, R. and Kimball T. Harper. (1995).** 1996. Genetic Variation Among Populations of *Arctomecon* (Papaveraceae). Pages 77-85 in Southwestern Rare and Endangered Plants: Proceedings of the Second Conference, September 11-14, 1995, Flagstaff, Arizona, General Technical Report RM - GTR-283. Rocky Mountain Forest and Range Experiment Station, Forest Service, United States Dept. of Agriculture, Fort Collins, CO 80526.



	COMMENT NUMBER		COMMENT NUMBER
<p>Date: May 28, 2003</p> <p>To: UDOT and Hurricane City</p> <p>Subject: Proposed location of Belt Route in the vicinity of Hurricane as discussed in the Southern Corridor DEIS</p> <p>From: Calvin and Mona Lowe Family, Landowners</p> <p>Attention: Thomas Hirschi, Mayor of Hurricane Robert Dowell, UDOT Project Engineer</p> <p>Our response is brief. The Master Plan developed by the PRC Toups Corp (copies of two maps attached) in November of 1978 as a requirement for annexation by Hurricane City AND the Southern Corridore DEIS Figure 2-7 are similar with two or three exceptions.</p> <ol style="list-style-type: none"> <li>1. The UDOT plan calls for a 300 foot wide easement in one of three locations to provide high speed traffic and limited access, while,</li> <li>2. The Toups plan calls for three 80 foot wide routes with unlimited access.</li> </ol> <p>Comment: The Lowes prefer the Toups plan which disperses the traffic and collects residents from North, South, East and West throughout approximately 7500 acres of land now owned by Winding Rivers (formerly SM), Lowes, Spillsburys and others in the vicinity.</p> <p>Combining the two proposed plans will allow approximately 40,000 people to to easily enter and exit the main collector roads, then enter a faster Belt Route at about 4500 South and 5000 west where the traffic enters a road that is 100, 200 or 300 feet wide.</p> <p>Figure 2-7 appears to be a "proposed" alternate in favor of tourists who want to load their cars in Las Vegas with gas and groceries and speed to Zion Park, tinkle at our rest stops, and never spend a dime in one of our local places of business. For 25 years tourists have been spending one night (on average) in Utah and 6-7 nights in Las Vegas playing the slots.</p> <p>UDOT--who are you working for? Unless the traveler is shopping in our stores and staying in our motels, he is a liability NOT an asset. He costs the state money and does not pay his share of costs to build highways.</p> <p>The Lowes recommend that UDOT follow figure 2-7 and build the sections shown in green, dark blue and light blue and assist Winding River (Outlaw Ridge Development), Utah Park Service and Hurricane City to build 80 foot roads shown in red and orange at 3400 and 2800 West.</p>	C-37	<p>Summary: Build the Belt Route from 4300 West the</p> <ol style="list-style-type: none"> <li>1. Shortest distance,</li> <li>2. Least expensive,</li> <li>3. Safest way possible.</li> </ol> <p>Encourage: Winding River to build a connector road from 3400 West and SR 9 through their property 80 feet wide, and the Lowes to build a 100 foot wide connector road from 2800 West through their property, both with unlimited access which will allow residents easy entrance and exit from the road and disperse traffic throughout two massive subdivisions as shown in figure 2-7 on page 2-47 of the March 2003 Southern Corridor DEIS.</p> <p>Review the enclosed Toups maps and please respect our master planner's inputs.</p> <p> Calvin and Mona Lowe Family, property owners of about 2500 acres in the Hurricane area</p>	<p>C-37 (cont'd)</p> <p>C-37.2</p> <p>C-37.3</p>
	C-37.1		

COMMENT  
NUMBER

C-38

C-38.1

COMMENT  
NUMBER

C-38  
(cont'd)



**Southern Corridor**  
Draft Environmental Impact Statement (DEIS)  
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Please tell us how you found out about this public hearing.

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☒ Other As a neighbor

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support?

Which alternative do you prefer and why? 4300 WEST  
keeps it away from residential impact  
and it is midline w/ 2054, 1655  
alignment.

Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns?

What other transportation projects should UDOT explore in the future?



**Southern Corridor**  
Draft Environmental Impact Statement (DEIS) <sup>MAY 31 2003</sup>  
Public Hearing Public Comment Form



Additional comments (attach additional sheets if necessary):

NO to 3400 West Alternative  
we moved to this area to get away  
from the ST GEORGE traffic, noise  
etc.  
→ This project would change all of  
that for our community.  
Please remember that people move  
away from innercity structures  
for a reason.

Name: Paul & Dory Woodard  
Organization: \_\_\_\_\_  
City, State, Zip: Huachuca, UT 84737  
Phone Number: 435-635-7292 E-mail: dory.woodard@utah.gov  
Would you like to be added to our mailing list? ☒ Yes ☐ No

Leave this comment form in the drop box,  
mail it to the address at right, or comment online at  
www.udot.utah.gov/sc. All comments must be received  
by May 30, 2003.

Southern Corridor Project  
HDR Engineering, Inc.  
3995 South 700 East, Suite 100  
Salt Lake City, UT 84107

	COMMENT NUMBER		COMMENT NUMBER
<div data-bbox="128 302 254 516" data-label="Image"></div> <p data-bbox="491 315 640 345"><b>Elaine Mills</b></p> <p data-bbox="281 355 856 373">645 N 1000 W Clearfield, Utah 84015 801-773-4444 775-2386 FAX 773-3336</p> <p data-bbox="296 414 396 431">May 25, 2003</p> <p data-bbox="300 457 802 513">SUBJ: SOUTHERN CORRIDOR PROJECT APPROVE 2800 W DONATE REAL PROPERTY (T42N R13W Section 17) TO OFFSET COST/MILES</p> <p data-bbox="300 552 642 607">TO: SOUTHERN CORRIDOR PROJECT 3995 SOUTH 700 EAST SUITE 100 SALT LAKE CITY, UTAH 84107</p> <p data-bbox="371 630 588 647"><a href="http://WWW.UDOT.UTAH.GOV/SC">WWW.UDOT.UTAH.GOV/SC</a></p> <p data-bbox="701 521 789 581">MAY 30 2003</p> <p data-bbox="176 721 798 813">1. We support the 2800 W route for the Southern Corridor Project. We have 20 acres that currently is located on the north side of 3000 S Hurricane Fields area. We are offering ten feet of the west side of T42N R13W Section 17 Glen and Elaine Mills property to offset UDOT acquisition costs. We are favorable in supporting the 2800 W Southern Corridor Project.</p> <p data-bbox="176 834 802 966">2. Currently the new road built on the south side of sand hollow reseivior traveling north has a cattle guard on the T42N R13W Section 20. The road turns east on 3000 S ( T42N R13W Section 17 (Northern Line) and Section 20 (Southern Line). If the road made a junction here proposed 2800 W and existing 3000 S Hurricane Fields the new 2800 W road would travel directly on the west boundary of our property. The property is most grazing acreage and no known habitat would be affected.</p> <p data-bbox="176 987 789 1042">3. Please feel welcome to contact us regarding giving ten feet of our property on the west side of the 20 acres. We are a member of the St. George and Hurricane Chamber of Commerce.</p> <p data-bbox="176 1055 483 1120"><i>Elaine Mills</i> Elaine Mills Owner, T42N R13W Section 17 40 acres</p> <p data-bbox="176 1140 453 1157">File: UDOT-Comment-2800W-03525</p>	<p data-bbox="947 253 999 271">C-39</p> <p data-bbox="940 729 1005 747">C-39.1</p>	<div data-bbox="1087 293 1213 508" data-label="Image"></div> <p data-bbox="1341 306 1709 337"><b>KINGS COURT PROPERTIES</b></p> <p data-bbox="1241 347 1816 365">645 N 1000 W Clearfield, Utah 84015 801-773-4444 775-2386 FAX 773-3336</p> <p data-bbox="1255 406 1356 423">May 25, 2003</p> <p data-bbox="1260 449 1761 505">SUBJ: SOUTHERN CORRIDOR PROJECT APPROVE 2800 W DONATE REAL PROPERTY (T42N R13W Section 17) TO OFFSET COST/MILES</p> <p data-bbox="1260 544 1602 599">TO: SOUTHERN CORRIDOR PROJECT 3995 SOUTH 700 EAST SUITE 100 SALT LAKE CITY, UTAH 84107</p> <p data-bbox="1331 621 1547 639"><a href="http://WWW.UDOT.UTAH.GOV/SC">WWW.UDOT.UTAH.GOV/SC</a></p> <p data-bbox="1136 712 1757 805">1. We support the 2800 W route for the Southern Corridor Project. We have 20 acres that currently is located on the north side of 3000 S Hurricane Fields area. We are offering ten feet of the west side of T42N R13W Section 17 Glen and Elaine Mills property to offset UDOT acquisition costs. We are favorable in supporting the 2800 W Southern Corridor Project.</p> <p data-bbox="1136 826 1761 958">2. Currently the new road built on the south side of sand hollow reseivior traveling north has a cattle guard on the T42N R13W Section 20. The road turns east on 3000 S ( T42N R13W Section 17 (Northern Line) and Section 20 (Southern Line). If the road made a junction here proposed 2800 W and existing 3000 S Hurricane Fields the new 2800 W road would travel directly on the west boundary of our property. The property is most grazing acreage and no known habitat would be affected.</p> <p data-bbox="1136 979 1749 1034">3. Please feel welcome to contact us regarding giving ten feet of our property on the west side of the 20 acres. We are a member of the St. George and Hurricane Chamber of Commerce.</p> <p data-bbox="1136 1047 1304 1112"><i>Glen Mills</i> Glen Mills Kings Court Properties</p> <p data-bbox="1136 1131 1413 1149">File: UDOT-Comment-2800W-03525</p>	<p data-bbox="1904 253 1957 271">C-40</p> <p data-bbox="1898 729 1963 747">C-40.1</p>



COMMENT  
NUMBER

C-41

C-41.1

COMMENT  
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C-41  
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Southern Corridor  
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MANA 11/2/2003

Please tell us how you found out about this public hearing.

- ☐ Newspaper Announcement   ☐ Web Site   ☐ Invitation   ☒ Flyer- mailed  
☐ Other \_\_\_\_\_

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support?

Which alternative do you prefer and why? 2800 West  
see other side

Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns? yes

What other transportation projects should UDOT explore in the future?  
extending Southern Corridor north across the  
Virgin River to I-15 and east to tie into roads that  
go to the Grand Canyon or along proposed pipeline from  
Pake Powell



Southern Corridor  
Draft Environmental Impact Statement (DEIS)  
Public Hearing Public Comment Form





Additional comments (attach additional sheets if necessary):

- 1- 2800 West provides the only opportunity to improve  
traffic flow in the future. The other alternatives  
leave no option for crossing the Virgin River
- 2- Advantages as listed in study. City of Hurricane prefers  
2800 alternative. Affected property owners not opposed to route  
as to disadvantages listed in study:
  - it appears this plan would actually be  
advantageous to recreational resources in  
the area
  - Cost may be lower than projected as major  
property owners/managers may donate right-of-way  
because of advantage to them and lava  
ridge may not be as extensive as budgeted for
  - Grazing allotments will be affected by development  
& recreation use anyway
  - Wildlife in area will have to adapt or relocate  
due to development & recreation use anyway
- 3- 400 - worst choice because of impact on wells & outland ridge  
cannot relocate wells
- 4- 300 - interchange with SR-9 would be dangerous

Name: Lea Thompson  
Organization: Thompson Family Pecan Farm 2012 S. Flora Ter  
City, State, Zip: Hurricane, Utah 84757  
Phone Number: 635-4921 E-mail: thomfarm@infowest.com  
Would you like to be added to our mailing list? Yes already on list, I think

Leave this comment form in the drop box,  
mail it to the address at right, or comment online at  
[www.udot.utah.gov/sc](http://www.udot.utah.gov/sc). All comments must be received  
by May 30, 2003.

Southern Corridor Project  
HDR Engineering, Inc.  
3995 South 700 East, Suite 100  
Salt Lake City, UT 84107

	COMMENT NUMBER		COMMENT NUMBER
<p>LEUCADIA FINANCIAL CORPORATION 529 East South Temple / Salt Lake City, Utah 84102-1089 / 801-521-5400, Fax 801-524-1751</p> <p>May 29, 2003</p>  <p>HDR Engineering 3995 South 700 East, Suite 100 Salt Lake City, UT 84107</p> <p>Gentlemen:</p> <p>This letter is in response to your request for public comments on the Southern Corridor project. I am Vice President of Leucadia Financial Corporation, landowner of over 2400 acres in the area.</p> <p>We agree that UDOT should secure adequate right of ways necessary to support future growth, but for traffic only and not for pedestrian or other uses.</p> <p>On the issue of transportation, UDOT's proposal for what is in effect an interstate highway is unnecessary and will ultimately prove self defeating. Based on our own studies, the traffic numbers projected do not justify the expense of an interstate highway for at least the next thirty years.</p> <p>We have solicited the assistance of Dr. Joseph Perrin, PhD, PE, and PTOE, in evaluating the traffic requirements and the UDOT proposal. His findings are attached. The 2030 traffic numbers projected by UDOT indicate a need for only two interchanges instead of 10-12, and the other locations can operate as at-grade intersections. The premise that the traffic patterns will require an interstate highway is misguided.</p> <p>We respectfully request that UDOT declassify the current plan as a highway with grade separation and reclassify it as an on-grade, access friendly expressway similar to the Bangerter Highway in the Salt Lake Valley.</p> <p>Sincerely,</p> <p>Leucadia Financial Corporation</p>  <p>Jim Ward, PE Vice President</p> <p>Attachment</p>	<p>C-42</p> <p>C-42.1</p> <p>C-42.2</p>	<p><b>Cherrol Kearsley</b></p> <p><b>From:</b> Joe Perrin [perrin@civil.utah.edu] <b>Sent:</b> Wednesday, May 28, 2003 11:23 PM <b>To:</b> Cherrol Kearsley <b>Subject:</b> RE: Southern Corridor - EIS Transportation response</p> <p>The following is transportation review for the Southern Corridor EIS.</p> <p>While we believe the assessment that was completed provides a demonstration of need for a roadway along the Southern Corridor to support development and access to the area, there appears to be a preconceived notion that a freeway with grade-separation is necessary. Why is an at-grade highway, with limited signalized access locations not included in the analysis for 2030?</p> <p>Page 1-2, Section 1.1 states that "the proposed transportation corridor is not intended to reduce future traffic on I-15 through St. George and Washington City. The route is necessary to accommodate regional transportation between existing and planned development east of I-15 and to effectively move traffic between I-15 and SR 9." This statement is clear that little by-pass traffic is expected. The latest values provided from the traffic modeling was an estimated 2900 ADT would utilize the entire corridor as an alternative to I-15 supporting the above statement. The concern that's raised is the proposed action of section 1.1.1 identifies interchanges defining the corridor as a grade-separated facility.</p> <p>Clearly, freeways have an ability to convey more vehicles with much higher capacities. The EIS identifies that a four-lane freeway has an 89,000 AADT while a four-lane rural highway is closer to 39,000 AADT. But when the 2030 projected volumes along the Southern Corridor only include one segment, the I-15 to 1<sup>st</sup> Interchange, where traffic is estimated to exceed the 39,000 capacity (Referenced from Table 2.1-1 on page 2-8), isn't it prudent to consider all reasonable options. According to Table 2.2-1 on page 2-20, each interchange is estimated to cost approximately \$10 million. This means that the interchanges represent between 60% and 80% of the construction costs for this project. As discussed on page 2-20, the road will likely develop in phases beginning with a limited access road and developing as needed to include interchanges at the defined access points. However, for development to occur, these access points need to be pre-defined as good planning dictates.</p> <p>Leucadia is a major land use holder along the Southern Corridor with almost 2,700 acres. This site has already been master planned with extensive input from the City of St. George and will include more than 3,600 dwelling units, 318 acres of office commercial, 434 acres of airport development, with two golf courses and support amenities including hotels, resorts and club houses. The site also includes a 46-acre mixed-use town center. Early in the project, the City and Leucadia developed a master plan for the 2,700 Acres and an at-grade facility was planned, more of the parkway atmosphere. Somehow this was changed to a Rural Freeway/Interstate and the parkway was eliminated. A freeway that bisects the Leucadia property was not anticipated nor expected throughout the planning process with the City. We agree that preserving the ROW for future expansion and interchange installation is prudent and should be preserved, the need for the future interchanges at each location is still questioned when the projected 2030 traffic is applied.</p> <p>Leucadia's vision was more of a high-speed highway like Bangerter Highway. Bangerter Highway carries in excess of 27,000 AADT throughout the southern portion (south of 9000 South) where it is a 60 mph, four-lane, uncongested highway. Bangerter Highway is often criticized for its congestion in the northern portion of the corridor where it carries in excess of 50,000 AADT. The expected future volumes along the western Salt Lake Valley did promote the need for grade-separated facility and Bangerter Highway would operate much more effectively as a freeway with grade separation. However, the volumes expected along the Southern Corridor are much lower than within the Salt Lake Valley.</p> <p>According to Table 1.3-2, the LOS C for a 5-lane rural-arterial is 22,000 for a LOS C and 28,000 for a LOS D. (SR 9 from Table 1.3-2). The concerns and need to examine the at-grade facility,</p>	<p>C-43</p> <p>C-43.1</p> <p>C-43.2</p>



COMMENT  
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C-43  
(cont'd)

impacts and travel inconvenience is based on the same criteria that the EIS states in section 1.3.1.2, Planning Goals. If a facility with a 2030 LOS D is deemed acceptable by the motorists as stated in the EIS, then why must the system be freeway based instead of at-grade. The questions that still need to be addressed include:

- What is the additional inconvenience to motorists
- Would a parkway actually change travel patterns.
- Where are the likely interchanges actually needed based on Capacity
- How does this change the project costs

The 2030 projected traffic numbers seem to indicate that there is a need for only two interchanges instead 10-12 and the others locations will operate as an at grade-intersections.

We ask that a discussion of how/why the at-grade parkway facility was eliminated from the alternatives and quantify the need for the freeway instead of the original parkway concept. We appreciate your consideration in this matter.

Joseph Perrin, PhD, PE, PTOE

COMMENT  
NUMBER

C-44



Southern Corridor  
Draft Environmental Impact Statement (DEIS)  
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JUL 3 4 2003

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- ☐ Newspaper Announcement   ☐ Web Site   ☒ Invitation   ☐ Flyer  
☐ Other \_\_\_\_\_

Which elements of the Draft Environmental Impact Statement for the Southern Corridor project do you support?

I SUPPORT THE CONCEPT OF A SOUTHERN BELTWAY FOR ACCESS TO THE FT. PINCKNEY INDUSTRIAL PARK THAT WILL ALLOW CURRENT AND PROJECTED TRAFFIC FROM THAT DEVELOPMENT TO TRAVEL TO I-15 WITHOUT USING EXIT 4. THIS ROADWAY ALSO MAKES SENSE TO ACCESS THE NEW/REPLACEMENT AIRPORT AND SAND HOLLOW REC. AREA.

Which alternative do you prefer and why?

THE ALTERNATIVE THAT WILL SERVE SAND HOLLOW.

Please list any important wildlife, plant life, historical landmarks, cultural resources, archaeological artifacts, or other issues along the proposed alignments that you feel the Draft Environmental Impact Statement did not address adequately.

I FURTHER SUPPORT THE PROPOSED ALIGNMENTS. THE TYPE OF ROADWAY CONCERNS ME. A ROADWAY LIKE THE SAND CANYON PARKWAY WOULD BE BETTER FOR THE ENVIRONMENTAL ISSUES THAN A FREEWAY DESIGN.

Do you feel that this public hearing provided you with adequate information and allowed you the opportunity to adequately voice your concerns?

YES-

What other transportation projects should UDOT explore in the future?

MILE POST #2 - ST. GEORGE BLVD.

C-44.1

C-44.2

	COMMENT NUMBER		COMMENT NUMBER
<p>May 29, 2003</p> <p>Gregory Punske, Project Development Engineer FHWA Utah Division 2520 West 4700 South, Suite 9A Salt Lake City UT 84118</p> <p>Robert Dowell, Project Director Utah Department of Transportation 1345 South 350 West Richfield UT 84701</p> <p>Southern Corridor Project HDR Engineering 3995 South 700 East, Suite 100 Salt Lake City UT 84107</p> <p><b>RE: <u>Southern Corridor Draft Environmental Impact Statement and Section 4(f) Evaluation (DEIS); FHWA-UT-EIS-03-01-D, UDOT SP-LC53(1)</u></b></p> <p>Dear FHWA, UDOT, and HDR Engineering Officials:</p> <p>Please accept this letter with my personal comments and concerns on the above-referenced DEIS. I am a resident of Washington County, Utah, and I use and care about the natural resources and environmental quality of this beautiful region. I request that you carefully consider my input, and thoroughly address it in the Final Environmental Impact Statement (FEIS).</p> <p>At the outset, I am shocked and disappointed with the incredibly myopic view in the DEIS toward almost everything south of the Utah-Arizona state line. After a full reading of the DEIS, I found few references to Arizona land uses, resources, or potential impacts. For a major project so near the state line, it is almost as if Arizona is "invisible" in this DEIS.</p> <p>The DEIS properly acknowledges many of the significant impacts that may occur in the southern St. George Basin in Utah due to construction of the Southern Corridor. However, it does not similarly acknowledge that these impacts will likely extend, at least to some extent, south of the state line into Arizona. When it comes to the rapidly increasing development and recreational pressures in this region, the state line on a map does little or nothing to prevent or reduce such impacts per se.</p> <p>For example, although the U.S. Bureau of Land Management (BLM)</p>	C-45	<p>is listed as a cooperating agency, the DEIS emphasis appears to be almost exclusively limited to the BLM St. George Field Office (SGFO) covering southwestern Utah. There is virtually no mention of the BLM Arizona Strip Field Office (ASFO) that manages the abundant federal lands south of the state line in Arizona. This is a serious omission. The explosive growth of development and recreational uses in the St. George basin spawns clear direct, indirect, and cumulative impacts not only on SGFO lands and resources but also on ASFO lands and resources. In addition, the DEIS references some SGFO management decisions and policies without referencing their relevant counterparts for the ASFO.</p> <p>A similarly serious DEIS omission involves Arizona State Lands and Mohave County Arizona. Where the proposed Southern Corridor diverts from the existing Interstate 15, and would proceed for several miles near the state line, much of the nearby lands to the south in Arizona are administered by Arizona State Lands. The DEIS fails to reference these state lands as well as the land use and planning authority of Mohave County Arizona. This area immediately to the south of the state line has already received increasing levels of recreational uses due to the expanding development to the north. Visible evidence of these uses includes the proliferation of off-road vehicle tracks and accumulations of litter.</p> <p>In recognition of these existing and foreseeable pressures, the ASFO has identified federal lands proximate to the spreading development in the southern St. George Basin as an Urban Interface area for purposes of its current Resource Management Plan (RMP) planning process. If this designation holds in the final, approved new RMP, it could lead to greater land disposals and other authorizations to facilitate the anticipated growth into Arizona. Unfortunately, this ASFO RMP planning process and possible Urban Interface area designation, and their overlap with the Southern Corridor, are not addressed in the DEIS.</p> <p>These DEIS omissions are more than mere technical, procedural defects. They may be indicative of a far more serious, substantive problem: poor, inconsistent, or superficial coordination of land use planning and environmental analysis efforts by relevant federal, state, and local agencies in this region (on both sides of the state line).</p> <p>I grew up near Los Angeles in an area of moderate development</p>	C-45 (cont'd)
	C-45.1		

COMMENT  
NUMBER

C-45  
(cont'd)

COMMENT  
NUMBER

C-45  
(cont'd)

amidst orchards, open space, and wildlife. Within the span of less than a decade, I saw first-hand what this lack of governmental coordination combined with great human pressures can mean in terms of poorly planned and unnecessarily congested and environmentally and aesthetically harmful development. I love this region that I now call home. I want public officials at all governmental levels here to learn from southern California's and others' past mistakes. I do not want these avoidable mistakes repeated. While growth is inevitable in this region, it can and should be properly planned and coordinated. This will ensure that development does not become blights on the landscape and that harmful impacts are effectively avoided, reduced, or mitigated. Indeed, much of this area's growth is due to the warm climate and spectacular scenery. If the St. George Basin starts to turn into another overdeveloped, crowded, strip-malled urban zone, I believe that it will lose much of this appeal and its uniqueness as a special place. If so, the local robust economy may gradually transition toward a downward trend. Indeed, if breath-taking scenery and a healthy environment comprise the "Golden Goose", we should maintain rather than smother it under concrete.

Along with the preceding general comments, I also wish to provide some specific concerns. For example, I support and applaud the proposed construction of a recreational trail parallel to the Southern Corridor. I believe that this trail would become very popular and receive high public use. However, the DEIS does not address how this new trail might connect, if at all, to other trails in the area and perhaps become an important part of an integrated, regional trail system. It also does not address the inherent conflicts that may occur between or among different types of trail users, such as motorized (OHVs) versus non-motorized (bikers, hikers, roller-bladers, equestrians, etc.). I hope that the proposed trail is implemented, but with better coordination with other area trails and to minimize user conflicts and avoidable impacts.

I am also concerned with the DEIS' limited references to special or protected areas. While section 3.1.2 (Existing Land Use) references the Beaver Dam Mountains Wilderness Area, it does not reference other comparable designations in the same region in Arizona, particularly the Paiute Wilderness Area and Grand Canyon-Parashant National Monument (GCPNM). This is especially important for the GCPNM because the proposed Southern Corridor interchange at River Road would become a key access point for

C-45.2

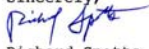
C-45.3

far more people to drive into remote portions of the Arizona Strip, including the GCPNM.

The DEIS study area boundary and most species-specific status and trend descriptions are arbitrarily limited to Utah. But there is no magical barrier to keep admitted impacts on resources and species on one side of the state line from also occurring on the other side. Similarly, while the DEIS acknowledges habitat fragmentation, it does so superficially because, for the most part, the DEIS discussion does not apply the described concepts to the actual facts and affected species, nor analyze the likely impacts. The reader cannot determine the relative significance of the Southern Corridor in cumulatively contributing to the potential decline or localized extirpation of native species due to some serious level of habitat isolation that may result in blocked necessary movements and/or inbreeding depression. The reader also cannot determine what mitigation measures, such as constructing more underpasses or providing wildlife movement corridors, may be needed at specific locations to help reduce fragmentation impacts. Common sense nevertheless indicates that the Southern Corridor may have far greater such impacts than the DEIS acknowledges. This is because it will hasten a large swath of development that may adversely affect most non-avian species. This long, linear corridor or barrier of development will largely bisect or fragment an area that now consists of largely connected and intact habitats.

Please substantially improve the FEIS to thoroughly address my comments and concerns, and to modify the project design and add mitigation requirements that will truly achieve the NEPA objectives of avoiding, reducing, and mitigating adverse impacts as much as possible. Please also effectively coordinate with the BLM ASFO, Arizona State Lands, and Mohave County to ensure that their plans and concerns are addressed. And please send me a copy of the FEIS.


Thank you very much for your consideration.

Sincerely,  
  
Richard Spotts  
1344 W. Diamond Valley Dr.  
St. George UT 84770-6009  
[spotts@infowest.com](mailto:spotts@infowest.com)

C-45.4

C-45.5



	COMMENT NUMBER		COMMENT NUMBER
<p>Ray Urbaniak 125 S. 2330 West Hurricane, UT 84737</p> <p>435 635-3981 naturalrfreq@yahoo.com</p> <p>May 25, 2003</p> <p>FHWA Utah Division &gt;ATTN: Gregory Punske &gt;2520 West 4700 South, Ste 9A &gt;Salt Lake City UT 84118</p> <p>Dear Mr. Punske,</p> <p>&gt;</p> <p>&gt;I urge you to go back to the drawing board with your Draft Environmental</p> <p>&gt;Impact Statement (DEIS) on the Southern Corridor. The study is inadequate. This environment is too fragile to tolerate this impact.</p> <p>&gt;for several reasons. The three alternatives studied do not provide a</p> <p>&gt;reasonable range of alternatives; they are three</p> <p>&gt;insignificantly-differentiated versions of the same bad plan.</p> <p>Although the</p> <p>&gt;DEIS includes a section on smart growth, this project is tied to the</p> <p>&gt;expectation that Washington County will not use any smart growth planning.</p> <p>&gt;In fact, the DEIS acknowledges no impact from public transportation-not</p> <p>&gt;even in the year 2030! It's very important to give citizens and policy</p> <p>&gt;makes a smart growth alternative that would save water, reduce air</p> <p>&gt;pollution, improve quality of life and diminish impacts to plants and</p> <p>&gt;wildlife.</p> <p>&gt;</p> <p>&gt;Although in the DEIS you make an admirable argument for smart growth, this</p> <p>&gt;project will in fact promote low-density, leapfrog developments while</p> <p>&gt;increasing the value of state lands, and private lands belonging to a</p> <p>&gt;cozy</p> <p>&gt;group of multi-millionaire land speculators. The DEIS fails to make an</p> <p>&gt;adequate connection between the traffic needs generated by your model and</p> <p>&gt;the solution you've chosen. By your own admission, the build alternatives</p> <p>&gt;would INCREASE traffic congestion on seven of thirty-three segments studied</p> <p>&gt;versus the no-build alternative.</p> <p>&gt;</p> <p>&gt;This project would also have devastating impacts on three endangered plant</p> <p>&gt;species. These plants have experienced serious habitat loss through</p> <p>&gt;development, drought and habitat degradation from off-road vehicles.</p> <p>This</p> <p>&gt;highway could be the death knell for the plants whose numbers are already</p> <p>&gt;down seriously before the project.</p> <p>&gt;</p> <p>&gt;Sincerely,</p> <p>Ray Urbaniak</p>	<p>C-46</p> <p>C-46.1</p> <p>C-46.2</p> <p>C-46.3</p> <p>C-46.4</p>	<div data-bbox="1060 284 1837 527">  <p>WASHINGTON COUNTY Water Conservancy District</p> <div> <p>Ronald W. Thompson District Manager</p> <p>Roberta McMullin Secretary-Treasurer</p> <p>Barbara G. Hjelle Counsel - Environmental Coordinator</p> </div> <div> <p>136 North 100 East, Suite 1 St. George, Utah 84770 Office: (435) 673-3617 Fax: (435) 673-4971 E-Mail: wwcwd@wwcd.state.ut.us HomePage: wwcd.state.ut.us</p> </div> <div> <p><b>BOARD OF TRUSTEES</b></p> <p>Dale Gubler, <i>Chairman</i></p> <p>Dennis Iverson, <i>Vice Chair</i></p> <p>Daniel D. McArthur</p> <p>Edward Bowler</p> <p>Morgan S. Jensen</p> <p>Jim Lemmon</p> <p>Howard Bracken</p> </div> </div> <p>May 29, 2003</p> <p>Via First Class Mail</p> <p>Gregory Punske Project Development Engineer FHWA Utah Division 2520 West 4700 South, Suite 9A Salt Lake City, UT 84118</p> <p>Dear Mr. Punske:</p> <p>This letter is written to comment on the Southern Corridor Draft Environmental Impact Statement and Section 4(f) Evaluation dated March 2003.</p> <p>The Washington County Water Conservancy District believes that it is of critical importance to the long-range transportation needs of Washington County that a corridor be available to conduct traffic from the western to eastern parts of the County. It is undoubtedly true that the area south of the City of Hurricane will continue to grow. It is also clear that a number of geographic and environmental constraints limit options for placement of east-west highways in the County. Based upon these considerations, we believe that the proposed 2800 West alternative would best serve the long-range needs of the County. This alternative will minimize the Highway 9 "bottleneck" to the greatest extent possible and provide the most direct route from the growing neighborhoods south of Hurricane into the St. George area.</p> <p>Because of the importance of the 2800 West alternative, we are reserving a 300-foot corridor along the existing public road which the District and the County have jointly constructed south of Sand Hollow Reservoir across property owned by the District. The current plans for Sand Hollow State Park are flexible enough to allow for placement of park facilities in areas that will not conflict with the corridor. We will also make every effort to ensure that the contractual arrangements with Utah State Parks and Recreation preserve the option to develop the road south of Sand Hollow Reservoir into the southern corridor.</p>	<p>C-47</p>



COMMENT  
NUMBER

C-47  
(cont'd)

COMMENT  
NUMBER

C-48

Gregory Punske  
Project Development Engineer  
May 29, 2003  
Page 2

We believe that the final EIS should more fully reflect the realities outlined above, recognizing that a significant benefit of the 2800 West alternative would be better traffic flow to and from the Hurricane area in comparison to the other alternatives.

In addition, the section entitled "Plan and Profile" only includes a plan section of the project. A profile of the project must be included and/or available for review in order to evaluate the grade of the road as it relates to the amount of cut or fill required for the project and the impact it will have on the surrounding environment.

If you have any questions, please do not hesitate to contact me.

Very Truly Yours,

  
Ronald W. Thompson  
District Manager

RWT:acj



State of Utah

School and Institutional  
TRUST LANDS ADMINISTRATION

Southwestern Area Office  
Michael O. Leavitt  
Governor  
Kevin S. Carter  
Director  
63 South 300 East, Suite 201  
St. George, Utah 84770  
435-652-2950  
435-652-2952 (Fax)  
<http://www.trustlands.com>

May 30, 2003

Mr. Gregory Dunske, Project Development Engineer  
**FEDERAL HIGHWAY ADMINISTRATION**  
**Utah Division**  
2520 West 4700 South, Suite 9A  
Salt Lake City, UT 84118

**SUBJECT: Comments on Southern Corridor Draft Environmental Impact Statement  
and Section 4(f) Evaluation**

Dear Mr. Dunske,

The School and Institutional Trust Lands Administration (SITLA) has reviewed the Draft EIS noted above. The Southern Corridor is proposed to be located on SITLA's Southblock property from I-15 at Reference Point 3 (Station 2000+00) to the Leucadia National Property (approximately Station 2277+25). We have the following comments on the draft document.

Page

Comment

S-2 and Figure 2-5

We concur that realignment noted here to avoid the Holmgren Milkvetch is not a viable alternative for the reasons noted and also noted in the correspondence from Larry Bulloch, dated January 24, 2002. In addition, it is not clear from Figure 2-5 that the Southern Corridor has any impact on the habitat area mapped for the Holmgren Milkvetch.

2-19, Chapter 11, and  
wherever applicable

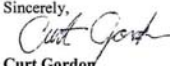
The correct name is School and Institutional Trust Lands Administration (SITLA).

2-21, 2-24, 2-25, and 2-26

The interchange locations are expected to change based on the master plans for the development of SITLA's Southblock property. The Southblock Master Plan identifies interchanges at I-15 at the Atkinsville Wash which also provide access to frontage roads; one about 1.5 miles southeast of I-15, one about 2.4 miles southeast of I-15, and one at River Road relocated to about 3.3 miles southeast of I-15. These are shown on the attached Exhibit 1.

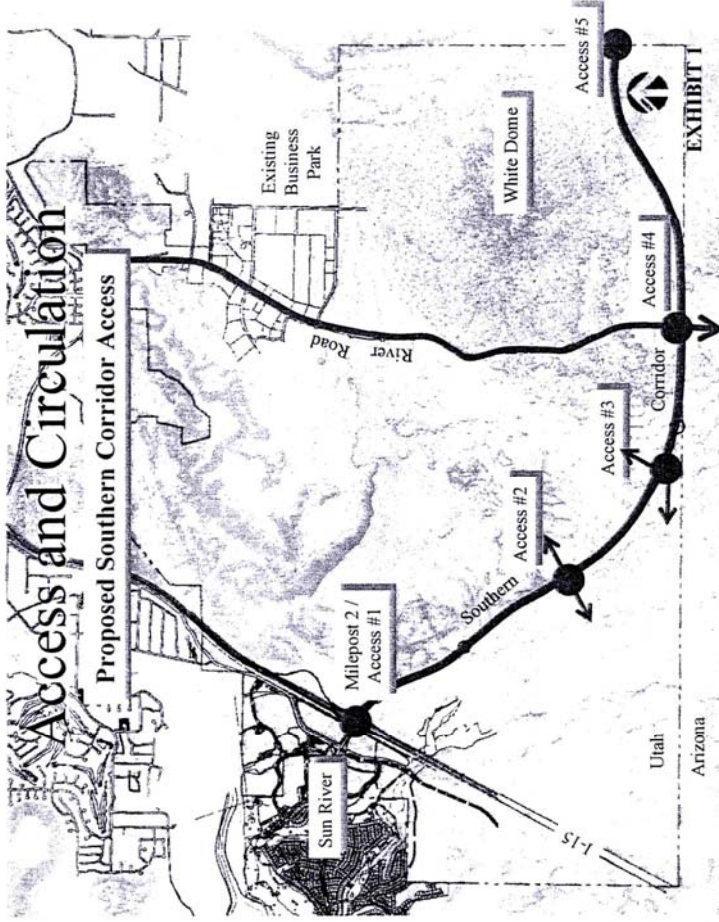


P:\ASBSB-COM-1 (175596.0054)

		COMMENT NUMBER			COMMENT NUMBER
<p>Mr. Gregory Dunske Federal Highway Administration</p> <p>May 30, 2003 Page 2</p>		C-48 (cont'd)	<p>Mr. Gregory Dunske Federal Highway Administration</p> <p>May 30, 2003 Page 3</p>		C-48 (cont'd)
<u>Page</u>	<u>Comment</u>		<u>Page</u>	<u>Comment</u>	
2-39	<p>There is no basis presented for the 300-foot total right-of-way width, except several references to protection of the Holmgren Milkvetch, which has not been demonstrated to be located within the right-of-way. The total width of roadway improvements is only 140 feet. The total width with all the indicated allowances for slope easements, drainage and detention, and trail totals 226 feet. Therefore, the total right-of-way should be limited to 226 feet.</p> <p>The EIS, however, should include an analysis of a corridor of up to 400 feet. This is because the right-of-way necessary at an interchange is cited as 400 feet. As the location of interchanges is not fixed, the environmental clearance should consider that they could be located at any point along the right-of-way.</p> <p>The information contained in Figure 2-3 and Appendix A does not clearly indicate what is the geographic area covered by the EIS. For example, is the area of the interchange between the Southern Corridor and I-15 included in the project covered by the EIS?</p>		4-89	<p>There is no data or mapping information provided that would indicate that there is Holmgren Milkvetch located adjacent to the Southern Corridor that would be protected by the 300-foot fenced right-of-way through the Southblock property. The total roadway improvements planned for the Southern Corridor at buildout are only 140 feet wide. Therefore, the additional right-of-way is not warranted, based on the data presented. SITLA has now completed a survey of the Holmgren Milkvetch which identifies specific areas where it is located. The Southern Corridor right-of-way should be limited to that necessary for roadway improvements, slope and drainage improvements, and planned interchanges. Habitat for the Holmgren Milkvetch should be acquired as mitigation for any impacts caused by construction of the Southern Corridor in a location that has been confirmed as an actual habitat area.</p>	
2-45	<p>The No-Build Alternative Roadway Network is not a realistic representation of development of the Southblock property without the Southern Corridor. The development of the Southblock would require an east/west arterial roadway, generally along the alignment of the proposed Southern Corridor, connecting to I-15 at Milepost 2. The Atkinsville Interchange would not be deleted, but would be built to serve land development projects planned for the area, rather than as part of the Southern Corridor project.</p>		Appendix A	<p>Although titled Roadway Plan and Profiles, no profiles are included in the document.</p>	
Page 4-4 and reference to Figure 4-1	<p>Similar to the comment above, the interchange at Reference Post 2 would be required as part of the land development planned for the area. Thus the land use change from commercial to residential is not appropriate.</p>		Appendix A, Page 1 of 20	<p>Between approximately Station 2060+00 and Station 2095+00, the Southern Corridor right-of-way is located between a wash and several hills. The 300-foot right-of-way causes the roadway grading to impact the hills unnecessarily. The roadway right-of-way should be reduced as noted above, and the roadway relocated southward, with some adjustment to the alignment of the wash. This would reduce the grading impact on the hills and produce a more aesthetic design for the roadway. Also, the alignment of the eastbound lanes and westbound lanes can have different vertical profiles between interchanges, allowing them to traverse cross slopes with reduced grading. If the location of future interchanges in the Southblock property can be fixed, this technique can be used to better match the roadway to the topography.</p>	
4-88	<p>A field survey of the Holmgren Milkvetch has been recently completed by SITLA on its property adjacent to the Southern Corridor right-of-way. Based on this new, more detailed data, the alignment most appropriate to avoid the concentration of Milkvetch may be reconsidered.</p>		<p>Sincerely,  Curt Gordon Deputy Assistant Director</p> <p>Attachment</p>		
PIA/SB/SB-COM-1 (175596.0054)			PIA/SB/SB-COM-1 (175596.0054)		

COMMENT  
NUMBER

C-48  
(cont'd)



COMMENT  
NUMBER

C-49

May 24, 2003

FHWA Utah Division  
ATTN: Gregory Punske  
2520 West 4700 South, Ste 9A  
Salt Lake City UT 84118

Ear Mr. Punske,

I urge you to go back to the drawing board with your Draft Environmental Impact Statement (DEIS) on the Southern Corridor. The study is inadequate for several reasons. The three alternatives studied do not provide a reasonable range of alternatives: they are three insignificantly-differentiated versions of the same bad plan. Although the DEIS includes a section on smart growth, this project is tiered to the expectation that Washington County will not use any smart growth planning. In fact, the DEIS acknowledges no impact from public transportation--not even in the year 2030! It's very important to give citizens and policy makers a smart growth alternative that would save water, reduce air pollution, improve quality of life and diminish impacts to plants and wildlife.

Although in the DEIS you make an admirable argument for smart growth, this project will in fact promote low-density, leapfrog developments while increasing the value of state lands, and private lands belonging to a cozy group of multi-millionaire land speculators. The DEIS fails to make an adequate connection between the traffic needs generated by your model and the solution you've chosen. By your own admission, the build alternatives would INCREASE traffic congestion on seven of thirty-three segments studied versus the no-build alternative.

This project would also have devastating impacts on three endangered plant species. These plants have experienced serious habitat loss through development, drought and habitat degradation from off-road vehicles. This highway could be the death knell for the plants whose numbers are already down seriously before the project.

Sincerely,  
*Russell Bezette*  
Russell Bezette  
P.O. Box 668  
LaVerkin, UT 84745



## Southern Corridor Final EIS

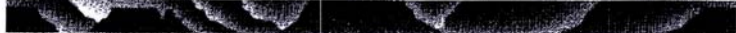


COMMENT  
NUMBER

C-52

C-52.1

G R A N D C A N Y O N T R U S T



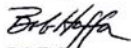
Gregory Punske, Project Development Engineer  
FHWA Utah Division  
2520 West 4700 South Suite 9A  
Salt Lake City, Utah 84118  
May 30, 2003

RE: Southern Corridor DEIS Comment Deadline

Dear Mr. Punske,

The Grand Canyon Trust, a non-profit conservation organization, is dedicated to the protection and restoration of the canyon country of the Colorado Plateau. We are in the process of reviewing the DEIS for the Southern Corridor, near St. George, UT and wish to make comment on its impacts and assumptions. This proposal has many ramifications for the future of southern Utah's human communities, its public lands, and the plants and animals that depend upon them. In order to sufficiently review the complexity of these issues and provide well-crafted and thoughtful comments, the public as a whole will need more than the 45 days that you have allowed for comment. We respectfully request that you extend the comment period by an additional 60 days. Thank you for consideration.

Sincerely,

  
Bob Hoffa  
Program Officer

2601 N. Fort Valley Rd., Flagstaff, Arizona 86001 (928) 774-7488 FAX (928) 774-7570  
www.grandcanyontrust.org



COMMENT  
NUMBER

C-53

C-53.1

May 23, 2002

By Certified US mail

William H. King, Co-chair  
Utah Native Plant Society  
1564 Wasatch Drive  
Salt Lake City, Utah 84108-2446  
801- 582-0432

Gregory Punske, Project Development Engineer  
FHWA Utah Division  
2520 West 4700 South Suite 9A  
Salt Lake City, Utah 84118

RE: Southern Corridor DEIS Comment Deadline

Dear Mr. Punske,




The Utah Native Plant Society was founded in 1978 and is dedicated to the preservation and understanding of Utah native wildflowers and their habitats. We have 9 chapters and 500 members statewide comprising both professional botanists and amateur plant enthusiasts. We are in the process of reviewing the DEIS for the Southern Corridor, near St. George and wish to make comment on its impacts and assumptions. No other federally funded project that anyone can remember has ever involved more federally listed, as threatened or endangered, wildlife species than this one, including four federally endangered plant species. As a consequence this DEIS requires careful consideration and thought on our part before making comment.

Ten days ago we requested from HDR Engineering and then UDOT directly, copies of the biological surveys conducted by Dr. Ron Kass, Intermountain Ecosystems. These surveys are the scientific underpinnings upon which much of the alternative analysis in the DEIS are based and they are frequently footnoted in the DEIS. To date, we have been denied access to these documents. Yesterday, we received a phone call from Vince Izzo of HDR Engineering stating that UDOT had approved providing us with a copy of the surveys and that we would be given a copy of Ron Kass's survey work, but not until Tuesday, May 27, 2003. We cannot imagine why that further delay is necessary. This will give us insufficient time to have these documents reviewed by our scientific members and make subsequent comment upon the DEIS.

We therefore request that you extend the public comment period on the DEIS for an additional 60 days beyond the May 30, 2003 deadline. The NEPA process requires that the public be fully informed of the environmental impacts of any federally funded project and be given adequate time to make comment. We hope that we will be able to obtain the documents on or after the 27<sup>th</sup> and that the deadline will be extended so that we can make thoughtful comment on the DEIS. Thank you for considering our request.

Sincerely

  
William H. King

<div data-bbox="123 297 336 393">  <div> SIERRA CLUB <small>FOUNDED 1892</small> </div> </div> <div data-bbox="489 297 863 362"> <div>Utah Chapter</div> <div>2120 South 1300 East, Suite 204, Salt Lake City, UT 84106-3785 TEL: [801] 467-9297 FAX: [801] 467-9296 www.sierraclub.org</div> </div> <hr/> <div data-bbox="489 441 585 466"> 23 May 2003 </div> <div data-bbox="403 477 623 501"> <i>Sent Via Certified Mail</i> </div> <div data-bbox="161 513 363 591"> Gregory Punske FHWA Utah Division 2520 West 4700 South, Ste 9A Salt Lake City UT 84118 </div> <div data-bbox="161 604 604 628"> Subject: Extension of Comments on Southern Corridor Draft DEIS </div> <div data-bbox="161 639 287 664"> Dear Mr. Punske: </div> <div data-bbox="161 675 863 790"> <p>We appreciate the opportunity to comment on the Draft DEIS for the Southern Corridor. We have spent the last two weeks studying the document carefully. It was in fact only during that period that our volunteers have had a chance to review the document. Although the Sierra Club is listed in the DEIS (p. 7-1) as one of the organizations to which the document was distributed, it was sent to Hal McMurrin. Mr. McMurrin, now eighty-one years old, served as chair of our Kolob Group in Washington County from 1984 to 1986.</p> </div> <div data-bbox="161 802 863 904"> <p>It was from another conservation group that our current chapter leadership found out the DEIS was available. As you might understand, this complex issue requires careful consideration. <b>We request you extend the comment period by sixty (60) days to allow more careful consideration and drafting of comments on the DEIS.</b> We appreciate your consideration of this request and look forward to your reply at the above address.</p> </div> <div data-bbox="489 917 613 941"> Very truly yours, </div> <div data-bbox="470 946 690 1013">  </div> <div data-bbox="489 1013 672 1055"> Jean Binyon, Chair Utah Chapter, Sierra Club </div>	<div> COMMENT NUMBER </div> <div>C-54</div> <div>C-54.1</div>	<div data-bbox="1075 297 1295 393">  <div>SIERRA CLUB <small>FOUNDED 1892</small> </div> </div> <div data-bbox="1451 297 1824 368"> <div>Utah Chapter</div> <div>2120 South 1300 East, Suite 204, Salt Lake City, UT 84106-3785 TEL: [801] 467-9297 FAX: [801] 467-9296 www.sierraclub.org</div> </div> <hr/> <div data-bbox="1451 441 1545 466"> 29 May 2003 </div> <div data-bbox="1113 488 1325 568"> Gregory Punske FHWA Utah Division 2520 West 4700 South, Ste 9A Salt Lake City UT 84118 </div> <div data-bbox="1113 579 1518 610"> Subject: Sierra Club Comments on Southern Corridor DEIS </div> <div data-bbox="1113 615 1247 646"> Dear Mr. Punske: </div> <div data-bbox="1113 652 1824 755"> <p>Thank you for the opportunity to comment on the DEIS for the Southern Corridor. Unfortunately I did not receive a copy of the DEIS until a week ago since the Sierra Club copy was mailed to a long-retired former officer of our group in St. George. This letter constitutes the official comments of the Utah Chapter of Sierra Club on the DEIS. Please direct any correspondence on this issue to the chapter's address indicated above.</p> </div> <div data-bbox="1113 760 1824 899"> <p>The Utah Chapter of the Sierra Club has approximately 4,000 members who have a strong interest in how the St. George area grows and how such growth impacts Zion National Park. We have 132 members who live, travel and enjoy the outdoors in highly-scenic Washington County. Many of our members in the state, as well as others from around the country, travel to and camp, hike and enjoy the magnificent beauty, peace, quiet and clean air in Zion National Park. All of these members would be impacted by sprawled development, lack of access to transit, air pollution, and unnecessary water and energy use resulting from construction of a freeway near the boundary of Zion National Park.</p> </div> <div data-bbox="1113 911 1824 1068"> <p>The area for which the freeway is proposed is not just anywhere in the United States. It is, after all, the corridor leading up to one of the world's most beautiful and inspiring parks. In the immediate area where the freeway would be, instead of "physical constraints", we see fascinating, colorful geological features and fragile soils with significant plant populations. We believe that the people who have moved to St George do it for the climate and the beauty of the area. Washington County has a wonderful opportunity before the expected overwhelming population onslaught to steer the growth in such a way that the beauty of the area is preserved and residential growth and access for all of the population, including senior citizens, is provided in the friendliest, least pollutant and water and energy consumptive manner.</p> </div> <div data-bbox="1113 1073 1824 1140"> <p>Having said that we want to address the inadequacies of the DEIS in complying with NEPA and the Endangered Species Act. The DEIS also does not provide smart growth transportation choices or protection of Zion National Park.</p> </div> <div data-bbox="1113 1146 1276 1175"> <u>PURPOSE AND NEED</u> </div> <div data-bbox="1113 1230 1459 1260"> Southern Corridor DEIS Comments / Sierra Club / 1 </div>	<div> COMMENT NUMBER </div> <div>C-55</div> <div>C-55.1</div>
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	COMMENT NUMBER		COMMENT NUMBER
<p>The purpose and need is summarized in several locations but perhaps most succinctly on p. 2-9, "Although the Southern Corridor does reduce some congestion, its primary purpose is to provide a regional transportation facility between St. George, Washington City, and Hurricane, with a secondary purpose of reducing congestion on some existing arterial roads." Further insight into the kinds of functions a regional transportation facility provides can be found throughout the document, but one may take this sentence on p. 4-20 describing the disadvantages of the no-build Alternative as typical, "For example, if resident [sic] in Hurricane wanted to access the planned industrial area in southern St. George, no direct access would be provided and local streets would have to be used." Yet the urgency and importance of this regional transportation facility is less apparent in the timing of construction as described on p. 2-20, "The first phase would likely be constructed by the time the St. George replacement airport is completed in 2008.... When traffic demand warrants, the highway would be expanded to become a four-lane, limited access highway with access being provided at interchanges. The second phase would likely be constructed starting at SR 9 and would eventually link to the St. George replacement airport. Construction of this phase would be after 2010 and would also start as a two-lane limited access road." [emphasis by authors of this letter]</p> <p>This description of the timing of construction betrays what the real purposes and needs for which the highway will be developed are. Certain specific developments, such as the airport, need access roads, and some of these access roads will also presumably relieve congestion. From figure 1-4, one can see the names of the influential corporations and persons whose developments will be turned into valuable highway-frontage land by the Southern Corridor. Leucadia Corporation, Klein Properties, Redhawk Subdivision, Dixie Springs, Outlaw Ridge and SITLA will all benefit financially from the construction of the Southern Corridor through or adjacent to their properties. One can postulate the fine-sounding objective of a regional transportation facility, but figure 1-4 speaks very eloquently of the financial forces bringing this highway into being to accommodate growth on their property. The allegedly crucial regional transportation facility can wait until after 2010. It's difficult to avoid the conclusion that a specific new highway was the a priori preference for UDOT, FHWA and city planners, and the purpose and need of a regional transportation facility were manufactured to dictate the outcome.</p> <p>The degree to which this DEIS fails the real transportation needs of Washington County can be found in table 2.1-3 on p. 2-14. After spending quite possibly \$300,000,000 for this highway, the residents of Washington County will, according to the traffic model employed, enjoy a whopping 7.7% decrease in their travel times versus the no-build alternative by the year 2030. Why would the public realize so little benefit from such a substantial expenditure? The construction of this highway bypass will create a haphazard, low-density sprawl that makes the automobile indispensable for most trips. From this induced need for more and more automobile trips will come more traffic congestion <i>caused by the Southern Corridor itself</i>.</p> <p>The purpose and need section assumes there will not be a much-enhanced transit system from what currently exists. The assumptions on transit need to be changed and a</p> <p>Southern Corridor DEIS Comments / Sierra Club / 2</p>	C-55 (cont'd)	<p>seriously enhanced transit system, with all the things that make it work, examined. The travel model did not use mode split capability. Since the current transit system is so limited, it would be useful to use the mode choices from other national park border cities that do have a good transit system. We are also dealing with a large senior citizen population in the St. George area. This population may be more interested in transit use than younger people. Assumption of a well-used, much-enhanced transit system would certainly change the presumed need for the proposed freeway.</p> <p><u>ALL APPROPRIATE ALTERNATIVES NOT ANALYZED</u></p> <p>Need for Smart Growth Alternative</p> <p>The Smart Growth description should be analyzed as an alternative, not just provided as an information piece about what it is possible to achieve. The DEIS catalogues in table 6.5-1 the many advantages of smart growth: more open space, thirty-five percent less water used, fewer vehicle miles traveled and less air pollution. Then the DEIS proceeds to ignore that analysis as though it's a mirage. It's not. All the build alternatives use VMTs that are either identical to, or insignificantly different from (Alternatives A and D differ by 1%), the VMTs the DEIS describes in table 6.5-1 as the result of conventional development through the year 2030. It is imperative for the disclosure and consultation purposes NEPA requires for a rigorous smart growth alternative to be included in this analysis. The smart growth alternative should be further enhanced with a robust transit system, since more compact residences make a well-used transit system more possible.</p> <p>The Deis Analyzes An Inadequate Range Of Alternatives</p> <p>The DEIS analyzes an inadequate range of alternatives. The principal difference among the three action alternatives is an insignificant distance between the termini on State Route 9. Alternative D terminates approximately 1.1 road miles (as measured along State Route 9) from Alternative A which itself terminates at a point only 1.3 road miles from the terminus of Alternative E. In addition to sharing exactly the same route for what appears to be seventy-five to eighty percent of their lengths—the analysis does not appear to provide that datum—all the build alternatives use exactly the same design standards and right-of-way.</p> <p>Right Of Way Width Alternatives</p> <p>All the build alternatives are designed to identical specifications as shown in figure 2-3. The right of way is at least 300 hundred feet wide as shown in the figure (although one finds on p. 4-37 the confusing observation that the right of way is 328 feet wide); presumably the right of way is even wider still at interchanges. And along the fairly extensive segment where the Southern Corridor would be paralleled by a frontage road, the cumulative corridor might be as wide as 350 to 400 feet. Assuming a total right of way for highway and frontage road of 380 feet, such a monster would consume approximately 45 acres for every mile of highway. We're perplexed that given the</p> <p>Southern Corridor DEIS Comments / Sierra Club / 3</p>	C-55 (cont'd)  C-55.3       C-55.4       C-55.5       C-55.6
	C-55.2		
	C-55.2		
	C-55.3		



	COMMENT NUMBER		COMMENT NUMBER
<p>DEIS's acknowledgement that 6.2 acres of bearclaw poppy habitat in the White Dome would be consumed by the alignment of all the build alternatives, no mitigation or alternative is even considered. Reduction or elimination of the 60-foot-wide median, or shifting the entire alignment south suggest themselves as possibilities. Why weren't these possibilities included as an alternative?</p> <p><u>NO-BUILD ALTERNATIVE IMPROPERLY ANALYZED</u></p> <p>The analysis of the no-build alternative improperly considers only the potential disadvantages of the alternative. At table 4.0-1 the DEIS shows 400 acres of new or expanded roadways for the no-build alternative versus 150 acres for each of the build alternatives. Presumably the difference of 250 acres is accounted for by the list of four new or expanded roads on p. 2-23 that would be developed only under the no-build alternative. Yet the reader searches table 2.1-1 in vain for these new roads that would be added under the no-build alternative. How can one realistically evaluate the levels of service in 2030, as this table purports to do, without this information? At p. 4-20 one reads, "It is likely that expanding the arterial system would further increase congestion." This sentence appears to be the only place at which the DEIS even deals with this question, and one need scarcely add this is not a quantitative analysis. Were these new or expanded roads even included in the traffic modeling?</p> <p><u>IMPACTS ON ZION NATIONAL PARK INSUFFICIENTLY ANALYZED</u></p> <p>There is little mention and virtually no impact analysis of the proposed freeway and resultant probable increased sprawl and air pollution on nearby Zion National Park. This is a very important national park that belongs to all of us, not just the people who may want to live in a low-density, auto-dependent fashion near Zion National Park. There needs to be a very serious study of the impact of this freeway and attendant low-density development on Zion National Park where there has been an excellent attempt to increase mobility and decrease pollution.</p> <p><u>THE CUMULATIVE IMPACTS ANALYSIS IS INADEQUATE</u></p> <p>Major Federal Projects</p> <p>At least three major federal projects are being considered in Washington County: Reference Post 13 Interchange, the replacement airport for St. George and the Southern Corridor. The Southern Corridor DEIS at least makes reference to the other projects; obviously, therefore, these projects qualify as reasonably foreseeable future actions. This DEIS would be the appropriate document in which to undertake such an analysis. An example of the failure of the DEIS to provide a cumulative analysis of all these federal projects is found in the discussion of cumulative impacts to air quality on p. 4-46, "Overall, the growth in the area by the 2030 planning period would likely be the same with or without the Southern Corridor...." What we need to know—and the DEIS fails to give us—is how much different growth and air quality would be without the RP 13 Interchange, the proposed replacement airport and the Southern Corridor.</p> <p>Southern Corridor DEIS Comments / Sierra Club / 4</p>	<p><b>C-55</b> <b>(cont'd)</b></p> <p><b>C-55.7</b></p> <p><b>C-55.8</b></p> <p><b>C-55.9</b></p>	<p>Cumulative Impact of Highway and Growth</p> <p>The highway will likely induce increased auto dependence and sprawl, which will increase water, land and energy consumption. All factors of this cumulative impact need to be analyzed.</p> <p>Bearclaw Poppy Habitat</p> <p>In addition to this generalized failure of the cumulative impacts analysis, the DEIS fails to properly account for the cumulative impact of the Southern Corridor and the proposed frontage road in St. George on bearclaw poppy habitat. The authors of the DEIS are sufficiently aware of the plans of the City of St. George to build a frontage road along its segment of the Southern Corridor to include it on the map denominated figure 2-7; however, in the description of the impacts of the Southern Corridor on p. 4-87 and p. 4-89, no mention is made of the frontage road. On p. 4-87, one reads, "Approximately one poppy and 6.2 acres of habitat would be within the ROW at White Dome." This discussion must disclose the cumulative impacts of all plans related to the Southern Corridor on endangered species at White Dome and elsewhere.</p> <p><u>VIOLATION OF THE ENDANGERED SPECIES ACT</u></p> <p>The common alignment violates the Endangered Species Act. Although the State of Utah Dwarf Bear Claw Poppy Recovery Plan was approved in 1983 and the USFWS approved a recovery plan in 1985, no significant funding or effort has been implemented by either agency to protect and recover the species. The population trend for the poppy has been downward in recent years, and additional habitat has been lost. In light of these agency failures, any further loss of poppy habitat in the White Dome area is unacceptable. At least one alignment alternative should move further south to avoid poppy habitat entirely.</p> <p>The measures to protect endangered plants from the destruction of habitat and taking of individual plants caused by the Southern Corridor are all in the conditional mode. On p. 4-89, one reads, "In addition, the Warner Ridge population could be protected by the Southern Corridor by limiting interchanges and reducing OHV access between the Redhawk subdivision and Washington Dam Road." One could just as easily present the counterargument that the highway itself will bring additional traffic into the area from which additional OHV pressure on habitat will result. One also reads on p. 4-89, "Fencing White Dome has already been proposed in the Washington County Habitat Conservation Plan and is the recommended mitigation for maintaining poppy habitat." It is not satisfactory to substitute pious palaver for an actual plan, and to describe these vague wishes as "active conservation (mitigation) measures" as the DEIS does on p. 4-87 is inaccurate.</p> <p>Southern Corridor DEIS Comments / Sierra Club / 5</p>	<p><b>C-55</b> <b>(cont'd)</b></p> <p><b>C-55.10</b></p> <p><b>C-55.11</b></p> <p><b>C-55.12</b></p> <p><b>C-55.13</b></p>




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C-55.14

INADEQUATE 4(F)/6(F) ANALYSIS

The sections 4(f)/6(f) evaluation is inadequate. White Dome was designated an ACEC by Governor Scott Matheson on 3 February 1984. Nowhere in chapter five is the significance of this designation considered for qualification of White Dome under section 4(f).

Sincerely yours,  
  
for Nina Dougherty  
Air Quality and Transportation Chair  
Utah Chapter, Sierra Club  
  
Mark Clemens  
Chapter Co-ordinator  
Utah Chapter, Sierra Club

COMMENT  
NUMBER

C-56



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8  
999 18<sup>TH</sup> STREET - SUITE 300  
DENVER, CO 80202-2466  
Phone 800-227-8917  
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MAY 30 2003

Ref: 8EPR-N

David Gibbs  
Federal Highway Administration  
2520 West 4700  
South, Suite 9-A  
Salt Lake City, UT 84118

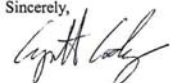
John Njord  
Utah Department of Transportation  
4501 South 2700 West  
Salt Lake City, UT 84114-1245

RE: DEIS for Southern Corridor Highway  
Washington County, UT  
CEQ# 030154

Dear Messrs. Gibbs and Njord:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and section 309 of the Clean Air Act, the Environmental Protection Agency's (EPA) Region 8 office is providing comments regarding the Draft Environmental Impact Statement (DEIS) for the Southern Corridor Highway Project, from I-15 at Reference Post 2 in St. George, Utah to SR-9 near Hurricane, Utah.

We would like to acknowledge the superior quality of this document in terms of disclosure of information. There is excellent information in this document on water quality, projected land use changes, habitat fragmentation and sustainable development principles. We also would like to thank the Federal Highway Administration (FHWA), the Utah Department of Transportation (UDOT), and their contractors for responding to many of the preliminary comments made by EPA, as well as an overall willingness to be creative and look at the bigger picture for this project. This was a pilot collaborative process, and we thought the process worked well.

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<p>The DEIS analyzed four alternatives: the no build alternative and three very similar build alternatives. The build alternatives have very similar impacts. We would like to make clear that the greatest impacts associated with this highway project are the indirect and cumulative impacts associated with the growth surrounding a new highway alignment. It therefore is very important that the information in Chapter 6 on Smart Growth be circulated and shared with interested parties in the community. If there is any way to publicize the chapter, it should be done. A good EIS provides information for future planning and project decisions. This EIS goes a long way in doing this. It analyzes a well thought-out no build alternative and summarizes sustainable development principles. The next step would have been to bring those two analyses together for future planning purposes. Although the information in Chapter 6 is thorough and unique, for future analysis, it would be helpful to take that next step and analyze a smart growth or sustainable development alternative that incorporates the principles outlined in Chapter 6 that are highly influenced by transportation and compare it to other alternatives. The analysis done, however, may go a long way in helping local planners and agencies to make future planning decisions.</p> <p>Our major comments include: 1) The lack of appropriate analysis for NEPA compliance for the BLM ROW. On page 1-1, it is stated that this DEIS will be adopted by BLM to fulfill NEPA compliance requirements pertaining to right of way (ROW) grant across public lands for this project. Impacts to BLM lands as well as management options and mitigation for these impacts, have not been addressed in this document; 2) Habitat fragmentation is a major issue and although very good information is included in the document, there is no mitigation for the impacts; 3) While the document does discuss 10 potential interchanges, there is no comparative analysis done on the impacts of fewer interchanges or interchanges in different locations. We are uncertain whether this will be analyzed at a later date; and 4) We recommend additional mitigation for air quality impacts from construction and water quality impacts. We have enclosed detailed comments on the above, as well as additional recommendations for the final EIS.</p> <p>Since our comments on the preliminary draft, there has been new information placed in the draft on the the no build alternative and potential interchanges, for example. So, despite the fact that EPA has been quite involved in the development of this draft, there is new information that forms the bases of many of our comments. Some comments, however, are the result of seeing the whole document at once, redone. We do believe that the early involvement on this project helped streamline the process.</p> <p>Based on the procedures EPA uses to evaluate potential environmental impacts of proposed actions and the adequacy of information presented, the EPA is rating all three build alternatives in this document EC-2. The EC (Environmental Concerns) rating is given when there are environmental impacts that should be avoided to fully protect the environment. The concerns here include habitat fragmentation from a new highway alignment through an</p> <p>2</p>	<p>C-56 (cont'd)</p> <p>C-56.1</p>	<p>undeveloped area. A rating of 2 is given because there is insufficient information for EPA to fully assess the environmental impacts of the BLM Right of Way. In general, however, this document provided sufficient information for EPA to fully assess the other environmental impacts, and we do appreciate the amount of attention given to EPA's preliminary comments. We have enclosed a summary of EPA's rating criteria and definitions.</p> <p>If you have questions on the enclosed comments, please contact Deborah Lebow of my staff at (303) 312-6223 or lebow.deborah@epa.gov. We look forward to working with FHWA and UDOT in partnership with other organizations, to identify sound solutions to the environmental impacts of transportation projects.</p> <p>Sincerely,</p>  <p>Cynthia Cody Director, NEPA Program Office of Ecosystems Protection and Remediation</p> <p>Enclosures (4): EPA's Detailed Comments Summary of EPA's Ratings Definitions Mitigation Measures to Reduce Emissions During Construction EPA Region X Daily Construction Emissions and mitigation</p> <p>cc: Greg Punske, FHWA Robert Dowell, UDOT</p> <p>3</p>	<p>C-56 (cont'd)</p>

	COMMENT NUMBER		COMMENT NUMBER
<p><i>EPA's Detailed Comments</i> <i>Southern Corridor Highway Project</i> <i>Draft Environmental Impact Statement</i></p> <p><b>NEPA Concerns</b></p> <ul style="list-style-type: none"> <li><i>BLM Right-of-Way:</i> The DEIS states that this document will be adopted by BLM to fulfill BLM's NEPA compliance requirements pertaining to a right of way (ROW) grant across public lands for this project (see page 1-1). We do not think the appropriate analysis has been done for NEPA compliance for the BLM ROW. Section 4.12.2 on Wildlife Habitat contains a statement that BLM will manage suitable public land habitats for recovery or reestablishment of native populations through collaborative planning, however, information on how that will be accomplished is missing. Section 4.3.8.2 states that the greatest impact of this project would be use of the undeveloped desert and sensitive environmental areas as the population increases. How this impact will be managed is not addressed in this document.</li> </ul> <p>We suggest that 1) A map be included in the document of the BLM lands and the ROW; 2) If the St. George Field Office Resource Management Plan includes this proposed ROW, the impacts and management measures should be disclosed or addressed in this document. If not, an additional NEPA document or an amendment should be done. At a minimum, it should address impacts from increased OHV traffic, increased recreational use from the increasing population and access, species of concern and how they will be protected, and management options for providing a barrier to these lands to reduce these impacts. For this document to be used as the NEPA document for the BLM ROW, significant additional information, with opportunity for public comment, will have to be added. If this is not modified, the statement on Page 1-1 should be taken out, and a separate NEPA document prepared for the BLM ROW, but that would not be the streamlined approach.</p> <p>At the outset of this project, BLM indicated an interest in using the Southern Corridor as a barrier to sensitive public lands. We recommended that this would be an appropriate additional purpose for this project. This purpose was not included and the scope of analysis did not address impacts on BLM land. In particular, the placement of interchanges may have an impact on BLM land. Alternatives with these impacts in mind could have been addressed.</p> <p>Chapter 2: Alternatives</p> <ul style="list-style-type: none"> <li><i>Preferred and Environmentally-Preferred Alternatives:</i> FHWA did not select a preferred alternative, nor did they define an environmentally-preferred alternative. When a preferred alternative is not selected in the DEIS, per EPA policy, we rate all alternatives. In the final EIS, we recommend that FHWA determine which of the alternatives is the</li> </ul>	<p><b>C-56</b> <b>(cont'd)</b></p> <p><b>C-56.2</b></p> <p><b>C-56.3</b></p> <p><b>C-56.4</b></p> <p><b>C-56.5</b></p>	<p>environmentally-preferred alternative. According to CEQ's policy, FHWA must select a preferred alternative in the Final EIS and an environmentally-preferred alternative in the ROD. If FHWA does not select an environmentally-preferred alternative, EPA can recommend one at the DEIS stage. The three build alternatives are so similar that it would be hard to select one over the other two. However, if protection of BLM land is included with one of the alternatives, EPA would likely consider this the environmentally-preferred alternative.</p> <ul style="list-style-type: none"> <li><i>General Alternatives Comment:</i> The three build alternatives are very similar. It would have been helpful for comparison to have an alternative that incorporates smart growth principles as a reasonable alternative to the three Southern Corridor Build alternatives.</li> <li><i>Section 2.2:</i> Ten potential interchanges are included in the analysis of each alternative. This is one feature of a new alignment in which alternatives (number and location) can significantly affect the indirect and cumulative impacts from growth and increased VMT. We understand that FHWA will not be making the decisions on number and location of interchanges. It is important for comparison purposes, however. It would have been helpful to analyze various scenarios of interchanges for their impacts. This analysis would be helpful to planners who are considering the information in Chapter 6 in how to develop the areas adjacent to the highway. (See section 4.1.1.2 for additional comment on this.)</li> <li><i>Table 2.1-3</i> - shows that the average trip length measured in hours decreases but that vehicle miles traveled (VMT) and speed increase. This tells us that drivers will be going faster over longer distances, which may have an impact on wildlife/vehicle collisions and potentially air emissions. As VMT goes up, so potentially do air toxic emissions and NOx. Please disclose these impacts in the document.</li> <li><i>Section 2.1.1.3 Mass Transit</i> - It is worthwhile to note that although the area is not suited to mass transit now, there are ways to plan for the growth that would allow for a viable mass transit system (i.e., buses and vans in this area) in the future. These could be outlined for future planning.</li> <li><i>Section 2.2.1 No Build Alternative:</i> We commend you on the work done to develop and analyze the no-build scenario. It is noted on page 2-22 that all the road improvements associated with the no-build would be included in the build alternatives also. It is not clear, however, whether these impacts were factored into the analysis of the build alternatives as they were in the no build alternative. If the improved road system was not factored into the build alternatives, the analysis should be revised to reflect this.</li> <li><i>Table 2.4-1 Comparison of Environmental Impacts:</i> We recommend that the text under the water quality resource category of this table include the amount of impervious surface that will be needed for each alternative, and that this be one of the impacts that is</li> </ul>	<p><b>C-56</b> <b>(cont'd)</b></p> <p><b>C-56.5</b></p> <p><b>C-56.6</b></p> <p><b>C-56.7</b></p> <p><b>C-56.8</b></p> <p><b>C-56.9</b></p> <p><b>C-56.10</b></p> <p><b>C-56.11</b></p>
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considered in designating the environmentally-preferred alternative. In the water body modification resource category, it is not clear whether the acreage for the build alternatives includes the acreage from the no build alternative, given the comment above that roads built for the no build will probably be built with the build alternatives as well.	C-56.11	future environmental impacts. Is there a way to develop sustainably so that the environmental impacts are reduced? This section refers to Chapter 6 on Smart Growth. We would suggest adding information on how many acres in fact can be left undeveloped under a smart growth scenario, from Table 6.5-1, or in fact putting the whole table in this section, as well as in Chapter 6, for emphasis on the environmental benefits of sustainable development.	C-56.16
<b>Environmental Concerns</b>	C-56.12		C-56.17
<ul style="list-style-type: none"> <li>It would be helpful to have just a paragraph on how this area fits into the Colorado Plateau, the ecosystem in which it lies. The Colorado Plateau, one of the most ecologically diverse areas in the world, is undergoing profound economic and demographic transformation. Extensive growth and impacts from expanded tourism are having an impact on the fragile natural and cultural resources in the area. Because of the nature of the ecosystem, the fragility of desert ecosystems, and the cultural resources, recovery from these impacts is slow and in some cases may never occur. This information may explain the big picture and why it is so necessary to protect the BLM lands in the project area.</li> </ul>	C-56.13	<ul style="list-style-type: none"> <li><i>Section 4.3.8:</i> This section makes it apparent how important a barrier will be if the Southern Corridor is built. Again, a commitment from BLM on management of these lands or additional information on the impacts to BLM land from this project is necessary in this document. In particular, the Warner Ridge ACED, which the document states may be potentially limited given the bearclaw poppy habitat, may need special management considerations. There is reference to use of the Southern Corridor as a barrier, but no BLM commitments in the document. Special measures from FHWA in constructing the highway (e.g., highway design as barrier or interchanges) could also be looked at in the document. The mitigation measures are inadequate to reduce impacts to the undeveloped desert and sensitive environmental areas as the population increases.</li> </ul>	C-56.18
<ul style="list-style-type: none"> <li><i>Table 4.0 -1:</i> Given the statement made in chapter 2 that the roadway improvements for the no-build alternative would likely be built for the build alternatives also, this table does not make sense. The additional acreage for "other major local roadways developed" should be similar for all four alternatives.</li> </ul>	C-56.14	<ul style="list-style-type: none"> <li><i>Section 4.8: Air Quality Impacts:</i> The air quality impact analysis done for this project is very good. The description of methodology is appreciated.</li> </ul>	C-56.19
<ul style="list-style-type: none"> <li><i>Section 4.1: Land Use Impacts:</i> This is one of the best land use impacts chapter we have seen in a transportation EIS. There is a great deal of information in here on the differences in the development that will occur between the build and no build scenarios that should be important to local planners.</li> </ul>	C-56.15	<ul style="list-style-type: none"> <li><i>Sections 3.8.2 and 4.8.5: Air Impacts to Zion:</i> It is not clear why the Zion National Park visibility data from the northwest boundary of the park noted in the DEIS was not presented in addressing cumulative impacts and impacts in Class I areas. The Zion monitoring location is much closer than the Bryce Canyon data that was presented. This is a significant issue as the cumulative impacts of high growth in the St. George area and transport from Las Vegas will have an increasing impact on visibility in the Class I area of Zion National Park.</li> </ul>	C-56.20
<ul style="list-style-type: none"> <li><i>Section 4.1.1.2: Indirect Impacts of Interchange Number and Locations:</i> The document states that ten interchanges have been initially identified by the cities to satisfy expected development. The section explains that the placement and number of interchanges can have an impact on the environment, but does not analyze the differences at all. While we agree with this section, it is not clear that any environmental analysis will be done before interchanges ultimately will be selected. As stated earlier, a comparison of scenarios on impacts from placement and number of interchanges would be helpful. We are uncertain that this analysis will be done at a later date and believe that the interchange impacts are indirect impacts of this project which should be analyzed. This information is needed by land use planners who may not get this information if it is not done here as well as to protect the BLM land.</li> </ul>	C-56.16	<ul style="list-style-type: none"> <li><i>Section 4.8.2: Construction Emissions:</i> The 2002 and 2003 estimated PM-10 for construction emissions is 697 and 630 tons/year respectively. The DEIS states that "This change is too small to have a major effect, and there would be no long-term effects because the emissions would be temporary. However, the DEIS states that one phase of construction is expected to last 4 years, which we would not consider short term. While the estimated construction PM is "less than 5% of the baseline" PM-10 emissions from construction for the entire county, it is significant when all 5% is concentrated in one corridor.</li> </ul>	
<ul style="list-style-type: none"> <li><i>Table 4.1-1 : Cumulative Land Use Impacts:</i> This section contains some really good information on acres developed. It states that about 27,700 acres have been developed and 309,300 acres are available for future development. The question remains whether those acres available for future development can be developed in a way that minimizes</li> </ul>		For comparison purposes, the vehicular highway PM-10 emissions estimate for all of Washington County is approximately 766 tons/year. At 697 tons/year for construction in 2002, the corridor construction emissions will nearly double the highway PM-10 emissions for the entire region for the years that construction takes place, and all 697 tons will be concentrated in one corridor. Construction mitigation measures are appropriate.	
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	COMMENT NUMBER		COMMENT NUMBER
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<p>The extremely dry climate and unpaved areas are likely to create a construction scenario that will produce huge amounts of dust in addition to the large amounts of PM emissions associated with diesel powered construction equipment. Significant mitigation including dust suppression, truck washing, street sweeping, equipment idling restrictions, on-road grade diesel fuel, alternative fuels (biodiesel), and emission controlled equipment should be considered.</p>	C-56.20		C-56.26
<ul style="list-style-type: none"><li>Section 4.8.3.2, <i>Emission Modeling</i>: In the emission modeling using Mobile 5b and CAL3QHC it appears that a free flow speed of 70 mph was used. For the segment analyzed, Table 2.1 shows LOS D. It is not clear whether a) the 70 mph free flow speed was used; and b) the 70 mph free flow is representative of LOS D. If LOS D is not a 70 mph free flow, the estimated maximum 8-hour average CO concentrations in Table 8.4-4 would be higher. As the estimated concentrations grow closer to the NAAQS, it may be necessary for the UDEQ to consider a monitoring program in the future.</li></ul>	C-56.21	<ul style="list-style-type: none"><li>Section 4.10.2.2: <i>Table 4.10-2</i>: Please explain why TSS values for the existing (does this mean no build?) scenario are larger than other alternatives.</li></ul>	C-56.27
<ul style="list-style-type: none"><li>We have enclosed information used by EPA Regions 9 and 10 on construction mitigation options. Many of these are applicable here.</li></ul>		<ul style="list-style-type: none"><li>Section 4.10.2.2: <i>Stormwater</i>: There is a statement to the effect that the Southern Corridor design would include roadside ditches and detention ponds to retain all highway storm water runoff for a 10-year storm event. An agreement or requirement in effect to require this should be referenced or in place. Please elaborate on how UDOT will ensure that this will occur.</li></ul>	
<ul style="list-style-type: none"><li>Section 4.9.4: <i>Cumulative Noise Impacts</i>: This section should include a noise evaluation from the updated St. George airport environmental assessment. In addition, this section should discuss the noise impacts to Zion National Park from all the growth in the area, as well as the new highway and airport.</li></ul>	C-56.22	<ul style="list-style-type: none"><li>Section 4.12.2: <i>Wildlife Habitat</i>: Under the no-build alternative, it is stated that 400 acres of major roadway pavement would be required, about 365 of which would be new alignment. These numbers are not the same as elsewhere in the document. And, again, does the analysis for the build alternatives include the 400 acres associated with the no build alternative given that these roads will be built anyway? It seems that if these numbers are not included for the build alternatives, the impacts for them are minimized.</li></ul>	C-56.28
<ul style="list-style-type: none"><li>Section 4.10: <i>Water Quality Impacts</i>: The water quality section is well done. There is an excellent discussion of typical highway runoff contaminants, and a good discussion of Total Dissolved Solids (TDS) and Total Suspended Solids (TSS). A summary of BMPs to be used during construction and beyond would be beneficial.</li></ul>	C-56.23	<ul style="list-style-type: none"><li>Section 4.12.3: We submit that habitat fragmentation is a very important issue with a highway like this and that it is a direct as well as an indirect impact. The discussion in section 4.12.4 on habitat fragmentation and roads as a barrier to wildlife is excellent. However, we believe more measures may be required to mitigate for this impact. We agree with the statement made that cities will need to implement land use planning that reduces the amount of area for development and lessens the habitat fragmentation impact. Development guidelines or agreements from the cities to address this issue would be appropriate in this document as mitigation.</li></ul>	C-56.29
<ul style="list-style-type: none"><li>Section 4.10.2: Although de-icing will be just a once a year event, it will still be necessary to have mitigation measures as de-icing salts will contribute to the TDS levels, already a TMDL issue in the Virgin River and this area.</li></ul>	C-56.24	<ul style="list-style-type: none"><li>Section 4.14.3: <i>Cumulative Impacts to Wildlife</i>: The cumulative impacts do include growth in the area. This section states that about 6.2 acres of bearclaw poppy habitat is within the Southern Corridor ROW and would be affected by construction, about 0.1% of total area habitat. But, the indirect and cumulative impacts would be much larger. We suggest including the number of acres of bearclaw poppy that could be affected with the growth in the area, a more important number. Some of this information may be included in the work being done under the EPA grant to the City of St. George. It is noted that FHWA and UDOT shifted alignment of the highway to avoid poppy habitat, but more mitigation may be required to address the indirect impacts of growth on the poppy. This is something that can be handled by an agreement with the local responsible agency to minimize impacts to the Poppy (and Milkvetch) when considering growth plans on private lands, or management measures on BLM or other public land.</li></ul>	C-56.30
<ul style="list-style-type: none"><li>Section 4.10.2: the document states that "Of the 87,700 acres of land available for development, 23,000 would be used for roadways and highways." The first number on land available for development is not the same as the number in Table 4.1-1. Unless we are reading the Table wrong, it is the number for the land available in urbanized areas, but does not include the land available in the county. Under the No-Build Alternative, this section states that about 250 additional acres of major roadways would be needed in lieu of the Southern Corridor. Again, it is stated elsewhere that the roads required for the no build analysis would be built under the build scenarios as well. These numbers need to be consistent. It would be helpful to compare total impervious surface numbers for each of the alternatives in this section.</li></ul>	C-56.25	<ul style="list-style-type: none"><li>Section 4.14.3.1: <i>Recommendations for Minimizing Cumulative Impacts</i>: This is the section where the grant from EPA to the City of St. George should be mentioned. The work done under the grant should be taken into account in this analysis. We have not seen the report yet, but my understanding is that if the plan is implemented, it may reduce expected VMT and protect or minimize impacts to the Bearclaw Poppy and Milkvetch</li></ul>	C-56.31
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	COMMENT NUMBER		COMMENT NUMBER
	C-56 (cont'd)		C-56 (cont'd)
habitat, but suggests that the Southern Corridor may be a significant commuting route to jobs. Please read the report when finalized in mid-June and make sure that results are summarized in this or other relevant sections.	C-56.31		
<ul style="list-style-type: none"><li>Section 4.19: Construction Impacts: As stated earlier, construction impacts from this project are not so short term. An additional impact should be added to the air quality impacts discussion, impacts from diesel-powered construction equipment. We have attached the construction mitigation measures used by regions 9 and 10 as examples of mitigation which can be used for this project. We recommend you use them as appropriate.</li></ul>	C-56.32	<p style="text-align: center;"><b>U.S. Environmental Protection Agency</b> <b>Rating System for Draft Environmental Impact Statements</b> <b>Definitions and Follow-Up Action*</b></p> <p style="text-align: center;"><u>Environmental Impact of the Action</u></p> <p>LO -- <b>Lack of Objections:</b> The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.</p> <p>EC -- <b>Environmental Concerns:</b> The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.</p> <p>EO -- <b>Environmental Objections:</b> The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.</p> <p>EU -- <b>Environmentally Unsatisfactory:</b> The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).</p> <p style="text-align: center;"><u>Adequacy of the Impact Statement</u></p> <p>Category 1 -- <b>Adequate:</b> EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.</p> <p>Category 2 -- <b>Insufficient Information:</b> The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.</p> <p>Category 3 -- <b>Inadequate:</b> EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.</p> <p>* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.</p>	
<ul style="list-style-type: none"><li>Section 4.23: Mitigation Summary: We recommend adding the air quality construction mitigation measures as well as whatever water quality additional measures would be required for de-icing and the TMDL, as well as more mitigation for habitat fragmentation such as agreements or processes by local governments which will reduce environmental impacts.</li></ul>	C-56.33		
<ul style="list-style-type: none"><li>Invasive Species: The document contains no information on invasive species. We do know that in the Colorado Plateau ecosystem, invasive species is a problem getting a great deal of attention, and that roads are a cause of the invasive species impact. We do not know whether in this particular area it is an impact. Please address whether this is an issue, and if so, what measures would be taken.</li></ul>	C-56.34		
<ul style="list-style-type: none"><li>Chapter 6 on Smart Growth: As stated before, this chapter is well done. We continue to believe that it would have been more useful to use this information to compare the sustainable growth scenario to the no build and build alternatives on a few resources or to have more information for consideration of indirect impacts and mitigation.</li></ul>	C-56.35		
<ul style="list-style-type: none"><li>Note: It does not appear that the road to the new St. George airport was taken into account in this DEIS. The EA for the airport clearly stated that the road impacts would be addressed in this EIS. Please disclose these impacts.</li></ul>	C-56.36		

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Mitigation Measures to Reduce Emissions During Construction

See NASA's *Summary of Impacts and Mitigation Measures*, Volume 1, Table 0-1, for air quality mitigation measures.

- Properly maintain construction equipment;
- Evaluate the use of available alternative engines and diesel fuels:
  - engines using fuel cell technology
  - electric engines
  - engines using liquified or compressed natural gas
  - diesel engines that meet the proposed EPA 2007 regulation of 0.01 g/bhp-hr (grams per brake horsepower hour)
  - diesel engines outfitted with catalyzed diesel particulate filters and fueled with low sulfur (less than 15 ppm sulfur) fuel
  - diesel engines fueled with low sulfur fuel
  - fueling on-site equipment, e.g., mining equipment, with lower sulfur highway diesel instead of off-road diesel fuel;
- Reduce construction-related traffic trips and unnecessary idling of equipment;
- Use newer, "cleaner" construction equipment;
- Install control equipment on diesel construction equipment (particulate filters/traps (DPTs), oxidizing soot filter, oxidation catalysts, and other appropriate control devices to the greatest extent that is technically feasible.) A particulate filter ("P-trap" or oxidizing soot filter) may control approximately 80% of diesel PM emissions. An oxidation catalyst reduces PM emissions by only 20%, but can reduce CO emissions by 40%, and hydrocarbon emissions by 50%. Different control devices may be used simultaneously.
- Reroute the diesel truck traffic away from communities and schools.
- Adopt a "Construction Emissions Mitigation Plan (CEMP)". A CEMP would help to ensure that the procedures for implementing all proposed mitigation measures are sufficiently defined to ensure a reduction in the environmental impact from diesel PM and NOx due to the project's construction. CEMP inclusions:

All construction-related engines are tuned to the engine manufacturer's specifications in accordance with the time frame recommended the engine manufacturer; not idle for more than 5 minutes; not tampered with in order to increase engine horsepower; include particulate traps, oxidation catalysts and other suitable control devices on all construction equipment used at the construction site; and use diesel fuel having a sulfur content of 15 ppm or less, or other suitable alternative diesel fuel. Minimize construction-related traffic trips through appropriate policies and implementation measures.

Consult with the PSCAA Air Quality Management District on an annual basis to determine if additional air quality mitigation for criteria air pollutants and/or toxic air contaminants is warranted, and to undertake such additional air quality mitigation as is appropriate and reasonable, and in an expeditious manner.

Implement an adaptive mitigation measure program over the project's construction phase.

4.0: Affected Environment and Environmental Consequences  
Construction Impacts

Significance of Impacts Remaining After Mitigation

After the implementation of the aforementioned mitigation measures, temporary land use impacts would be reduced to an insignificant level.

4.19.2.6 Air Quality

Impacts

The project would generate pollutant emissions from the following construction activities: 1) the demolition of existing structures, 2) excavation related to cut-and-cover and tunneling operations, 3) welding related to continuously welded rail (CWR) operations, 4) mobile emissions related to construction worker travel to and from project sites, 5) mobile emissions related to the delivery and hauling of construction supplies and debris to and from project sites, and 6) stationary emissions related to fuel consumption by on-site construction equipment.

Table 4.19-4 presents the estimated worst-case daily emissions associated with each construction phase. As indicated in the table, NO<sub>x</sub> and PM<sub>10</sub> emissions are anticipated to exceed SCAQMD significance thresholds during most of the construction period. Short-term dust nuisance impacts would also occur as a result of construction activity.

TABLE 4.19-4 DAILY CONSTRUCTION EMISSIONS <sup>1</sup>						
Construction Phase	Duration <sup>2</sup>	CO	ROG	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>
SCAQMD Threshold		550	75	100	150	150
Demolition	1	17	4	38	3	26
Cut-and-Cover (Underground Excavation)	14	37	8	67	4	186
Tunnel Boring (Dual Operation)	12	100	23	172	10	109
Finish Stations and Tunnels	15	54	11	99	8	54
Continuously Welded Rail Operations	26	42	14	100	11	12
At-Grade Platforms and Rail Installation	26	74	16	141	10	461
Simultaneous Excavation and Tunnel Boring	6	137	31	239	14	295
Simultaneous Excavation, Tunnel Boring & Demolition	1	154	35	277	17	321
Simultaneous CWR and Rail Installation	26	116	29	241	21	473
Potential Threshold Violation?		No	No	Yes	No	Yes

<sup>1</sup> Expressed in pounds per day  
<sup>2</sup> Expressed in months.  
Source: Terry A. Hayes Associates.

Although the total construction period will last about four to five years, air quality impacts would still be localized and short-term. This is because construction equipment, and, therefore, air quality impacts, would move throughout the six-mile project alignment area. Thus, impacts on individual receptor locations within the area that may be affected by the proposed project would be short-term. Furthermore, because of the nature of construction activity and the phased construction schedule, some days will experience a higher level of construction activity (which in turn generates a higher level of emissions), while others will not.

Significance of Impacts

Air quality impacts during construction are potentially significant.

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TABLE S-8  
SUMMARY OF IMPACTS

Alternative <sup>1</sup>	Potential Environmental Impacts	CEQA Determination of Significance	Mitigation Measures	CEQA Significance After Mitigation <sup>2</sup>
Land Use and LRT Build	Development-Construction Impacts: Short term air quality impacts and traffic impacts around construction staging areas could be avoided by plans and policies intended to attract new businesses and residents to the area. However, long term benefits of LRT operations would further local goals and policies.	Less than significant	The project would be built in stages thereby diminishing the overall impact of construction activity. MTA will coordinate with local businesses and residents to provide advanced notice of construction activities and delays and potential utility disruptions.	Less than significant
Air Quality-Construction Impacts LRT Build	Air quality impacts are anticipated due to demolition of existing structures and construction activities, welding related to continuously welded rail operations, and stationary emissions from on-site construction vehicles, and stationary emissions from on-site construction equipment.	Potentially Significant	Mitigation measures to meet MTA's Systems Design Criteria and Standards will be included in the construction contract. A variety of mitigation measures are presented in Section 4.19.2.6 of the Final SEIS/SEIR.	Less than significant with the exception of PM <sub>10</sub> and NO <sub>x</sub> emissions. Impacts from those emissions would be less than significant.
Noise and Vibration-Construction Impacts LRT Build	Noise impacts likely in the at-grade segments. Vibration impacts possible at both the at-grade and subway segments.	Significant	<ul style="list-style-type: none"> <li>Mitigation will be required to meet City of Los Angeles and MTA construction noise and vibration criteria.</li> <li>Contractor will be required to prepare and implement a Noise and Vibration Control and Monitoring Plan.</li> <li>Contractor will construct MTA-approved noise reduction barriers at all truck out sites to meet applicable federal, state, and local noise regulations.</li> <li>MTA will coordinate with LAUSD and individual school administrators to determine and implement strategies to maintain acceptable interior classroom noise levels.</li> <li>Contractor will be responsible for</li> </ul>	Potentially significant

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July 9, 2003

By Certified U.S. mail

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RE: Southern Corridor DEIS Comments

Dear Mr. Punske,

As you know, the Utah Native Plant Society filed a request on May 23, 2003 for an extension of the deadline for comments on the Southern Corridor DEIS. Thank you for extending the comment period to July 11, 2003. We wish to revise some of our previously submitted comments and have changed the text accordingly.

The Utah Native Plant Society was founded in 1978 and is dedicated to the preservation and understanding of Utah native wildflowers and their habitats. We have 9 chapters and 500 members statewide, comprised of both professional botanists and amateur plant enthusiasts. We have reviewed the DEIS for the Southern Corridor road project, near St. George and wish to make comment on its impacts and assumptions. No other federally funded project in Utah that anyone of us can remember has ever involved more federally listed threatened or

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<p>endangered wildlife species than this one, which includes four federally endangered plant species.</p> <p>The Grand Canyon Trust is a non-profit conservation organization that is dedicated to the protection and restoration of the Colorado Plateau. We are very concerned about the potential impacts of this project on both the human and natural communities of southwest Utah.</p> <p>The Center for Biological Diversity protects endangered species and wild places of North America and the Pacific through science, policy, education, citizen activism and environmental law. We have 7,500 members across Utah and the nation.</p> <p><b>Purpose and Need:</b></p> <ul style="list-style-type: none"><li>• THE DEIS ASSUMES STATUS QUO AND FAILS TO TAKE INTO ACCOUNT TRENDS AND RECENT EVENTS</li></ul> <p>The DEIS fails to take into account current and recent events that could result in a slowdown in the St. George area population growth and needs to be re-evaluated in the light of such things as 9-11, terrorism, wars, recession, hanta virus and SARS.</p> <p>The airline industry is severely depressed with many of the major carriers near bankruptcy and shows few signs of recovery in a post 9-11 world; this road is being built primarily to service an airport that could actually show a decline in usage. The DEIS fails to acknowledge the trend towards broad acceptance of mass transit across the country and what role it may play in St. George, assuming energy consumption will stay like it is even as the American energy system is nearing a stage of crisis in terms of available fossil fuels. Tourism may not play the role in the future that it has in the past. The building of the new St. George airport, which the Southern Corridor will serve, could be postponed.</p> <p>St. George is not an industrial city and has very little industry base. The DEIS acknowledges a lack of a centralized business district. The population of St. George has always been based on retirees and tourists and the businesses that support them. In the past, retirees and tourists who do not need roads to go to work were fueling growth of the population. The economy remains depressed and shows no signs of improvement; this has slowed tourism and, in turn, the need for growth. The county can therefore control this growth with appropriate planning and create an open space environment in an extremely arid, water-poor area.</p> <p>The DEIS ignores the fact that global warming is becoming a reality and the current climatic/drought stage could in fact last for a considerable period of time. Climatic/drought conditions have persisted through most of the 1990's creating</p>	C-57 (cont'd)	<p>serious problems and warning signs that cannot be ignored: the Virgin River in the year 2000 was approximately 25% of normal and Lake Powell is at 49% of normal in early 2003. The continued rise in temperatures (record breaking weather several years in a row) may make the St. George area a less desirable place to live. The DEIS failed to analyze if the limiting factor of water supply will limit growth over the next 30 years. In fact it is not illogical to assume that the drought could extend throughout the entire period that the DEIS is intended to cover: an example would be the recent 30-year drought in northern Africa and currently there is no basis to assume this period of drought in Washington County will end any time soon.</p> <p>The DEIS fails to take into account the role that interest rates play in making housing in St. George affordable to those who move to town. Currently interest rates are at a 45-year low and can only go up reducing immigration to St. George and reducing the population growth rate in the future.</p> <p>The DEIS further assumes that the next 30 years will be one of high growth like the last 30 years. The DEIS, section 1.5.1, states that the population of St. George in 2030 will be 122,727 people, according to the model from the Governor's Office of Planning and Budget. A confidence interval or probability of this increase occurring is not given. Furthermore, these estimates are deemed too low because of future land use plans in St. George and the estimates are increased to 147,990 residents in 2030 and are used in the DEIS to justify this project. However, the large supply of available land in the land use plan does not create demand for that land. Taking into account the above long term negative factors on demand, it is just as reasonable to assume that a no growth or slow growth scenario will take place. Given a 2% per year growth rate to 2030 the population would only be 90,568. This lower number does not justify the proposed Southern Corridor and calls out for a more conservative project.</p> <p><b>Proposed Alternatives:</b></p> <ul style="list-style-type: none"><li>• NO BUILD ALTERNATIVE IS INVALID</li></ul> <p>A valid "no-build" alternative has not been provided in the DEIS. Further, the arguments "for" the provided no-build alternative are at least in part not valid. The statement on page 4-87 (paragraph 4.14.1.1) is speculative and the impacts would have to be analyzed separately. It is a false statement that threatened and endangered species habitats were not found in the St. George replacement airport.</p> <p>Of most concern, the DEIS makes the following contradictory statements concerning the three alternatives (DEIS p. S-8): "This alternative would help BLM provide a barrier to protect the Warner Ridge population of endangered bearclaw poppy from recreation</p>	C-57 (cont'd)
	C-57.1		C-57.3
	C-57.2		C-57.4

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activities."	C-57 (cont'd)		C-57 (cont'd)
And then this statement about the no-build alternative:			
"This alternative would not provide a barrier to protect the Warner Ridge population of endangered bearclaw poppy from recreation activities."	C-57.5	pollinators. The USF&WS acknowledges that little is known about the rare bee pollinators. In fact, there may be more than the two native bee species that are involved (there may be two species of <i>Perdita</i> for example). <i>Perdita meconis</i> was only first described in 1993; it is considered rare and should be managed as a sensitive species. Utah has a huge diversity (over 1,000 species) of native bees and there could be a heretofore-unidentified bee species that is playing a significant role in the survival of the federally listed species. In addition to this, while the <i>Synhalonia</i> is not as rare as <i>P. meconis</i> , its nesting locations are not known.	C-57.9
Beyond the contradictory nature of these statements, we completely reject them as lacking scientific basis and in fact, are misleading and should be removed from the DEIS and not be considered as a favorable factor in connection with any "build" alternative. A "no-build" alternative must be developed that will have no impacts on rare plant species.	C-57.6	The DEIS contains inaccurate statements which indicate that the appropriate experts, such as Vincent Tepedino, have not been properly consulted. For example:	
• OTHER ALTERNATIVES HAVE NOT BEEN ADEQUATELY EXPLORED		"Synhalonia is not specific to poppies." (DEIS, p. 4-88)	
A consideration of other options has not been provided. The DEIS only considers alternatives to the northern connection route to the town of Hurricane. No alternatives are considered near the new airport. The widening of I-15 or moving the road further south (into Arizona if necessary) to avoid White Dome are other possibilities that have not been considered.	C-57.7	This is incorrect and it is obvious that qualified entomology experts, such as Vincent Tepedino, have not been consulted.	
<b>Environmental Impacts:</b>		The statement that the milkvetch is "self-compatible and not totally dependent on animal pollinators" (DEIS, p. 4-88) is not entirely true. Studies need to be conducted to determine the (a) quantity and (b) viability of self-pollinated versus out-crossed fruits.	
• SEED BANK STUDY NEEDED		The DEIS has not taken into consideration available data from studies conducted by the USU Bee Lab which could shed further light on the status of bee/pollinators in the proposed construction area.	C-57.10
The DEIS fails to provide any study for seeds in the soil. It is well known that seeds of <i>Arctomecon humilis</i> are initially undeveloped and may take several years for the embryo to develop. The amount of seed bank (especially given drought conditions of the past five years) has been shown to be a critical factor in the survival of this species (and could also be in connection with others). Just because a live plant specimen was not found does not mean that plants have not grown in any proposed areas of disturbance and seed bank studies must be conducted for the federally listed species. It is known that the <i>Arctomecon humilis</i> seeds can be viable for ten years or more.	C-57.8	• POLLINATION STUDY NEEDED	
• RARE BEE STUDY NEEDED		This is a different issue, although related, to the rare bee issue. The new highway will likely create a barrier to pollinators who are traveling between populations. Contrary to the assertion of the study, construction of the highway will likely reduce the gene flow and lead to gene loss or genetic drift and hasten the extinction of three federally listed endangered plant species. While specific studies about bees and highway traffic are not known, there are studies analyzing the impact of highway traffic on insects which show heavy insect losses and this impact has not been gauged in any way in the DEIS. For example, <i>Synhalonia quadricincta</i> is suspected of being capable of pollinating Warner Ridge and White Dome; what impact would the construction of the highway have on this process?	C-57.11
While the DEIS makes reference to the fact that rare bee/pollinators are in the study area (see pp. 4-88-89), there is in fact no scientific basis to gauge the impacts since the locations of the pollinators are not known. Therefore, protecting "ground nesting pollinators" as described on DEIS p. 4-126 cannot possibly be undertaken without a bee/pollinator study, which needs to be done in connection with <i>Arctomecon humilis</i> , <i>Astragalus holmgreniorum</i> and <i>Pediocactus sileri</i> .		• SOIL ANALYSIS NEEDED	
Any plan to ensure the survival of the bearclaw poppy, according to Vincent J. Tepedino (research entomologist, USU Bee Lab), must include protection of its		There appears to be no soil analysis considered in the DEIS. Cryptogamic soil has been determined to be important for the survival of some of the listed plants species. Appreciable loss of cryptogamic soil from highway construction could	

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have a serious negative effect on the endangered plant populations; it is vital that this issue be addressed.

- **CRITICAL HABITAT DESIGNATION REQUIRED**  
Recently (late June 2003), a preliminary meeting was held by the USFWS in St. George to discuss a multi-species recovery plan for the four listed plant species identified by this project (three of which have been identified as being likely harmed). Follow-up meetings are planned for the fall. The USFWS also intends to designate critical habitat for the two *Astragalus* species as well as *Arctomecon humilis*. Until the multi-species recovery plan process is completed and the critical habitat is designated, no disturbance of actual or potential habitat should occur. After critical habitats for all endangered species in the project have been designated these habitats should be avoided by any road project.

- **SENSITIVE PLANT SPECIES NOT SURVEYED**  
The DEIS and prior plant surveys limited its scope of analysis solely to four federally listed endangered plant species. The DEIS is required to consider federal and state sensitive and rare plant species as well. The viability of all species within the project must be ensured including the following, which are known from the St. George area and grow within the elevation range of the Southern Corridor road project:

- Camissonia parryi*
- Cirsium virginense*
- Cynanchum utahense*
- Enceliopsis argophylla*
- Eriogonum subreniforme*
- Lomatium scabrum* var. *tripinnatum*
- Oenothera deltoidea* var. *decumbens*
- Pediomelum mephiticum*
- Petalonyx parryi*
- Phacelia anelsonii*
- Sclerocactus johnsonii*
- Yucca elata* var. *utahensis*

All of these sensitive species are on the Utah Division of Wildlife Resources, June 1998 "rare" or "watch" species lists. *Cirsium virginense* and *Petalonyx parryi* are on the BLM, August 2002, draft sensitive species list for Utah. *Cirsium virginense*, *Enceliopsis argophylla* and *Phacelia anelsonii* are on the Nevada Natural Heritage rare or watch lists.

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Ron Kass listed *Petalonyx parryi* as a species associated with *Arctomecon humilis* on May 8, 2000 at Warner Ridge in his technical report of September 2000. He also located *Petalonyx parryi* in the survey of the Atkinville interchange on October 31, 2000.

*Tetradymia axillaris* var. *longispina* and *Tricardia watsoni* are on the BLM Arizona Strip Field Office Special Status List, are known from Washington County at the right elevation, and should be surveyed for too. *Enceliopsis argophylla* is also on the BLM Arizona Strip list.

Failure to survey for these species and mitigate for their presence could trigger the need for these species to be listed, i.e. could cause them to be become threatened or endangered.

- **PLANT SURVEY INADEQUACIES**

Miscellaneous comments:  
The method of the plant pre-surveys only involved checking records collected from the B.Y.U. Herbarium. Other major herbariums, as well as the Utah Natural Heritage Program, should also have been consulted.

Dr. Kass is a well-known botanist, however, he assisted with other bird and animal surveys. His credentials in this regard have not been presented in the DEIS.

3-51 - *Arctomecon humilis* occurs throughout White Dome and White Dome represents critical habitat for the species.

3-52 - *Pediocactus sileri* has already been "taken" in connection with the airport project and it is likely to occur in the study area.

- **BIOLOGIC ASSESSMENT LACKS SCIENTIFIC EVIDENCE**

The DEIS one-for-one proposal for habitat exchange is not acceptable and is not scientifically valid. The federally listed species cannot be successfully germinated and survive for any period of time outside of their natural environment, nor can they be transplanted successfully. Their unique growing conditions cannot be easily duplicated. The one-for-one exchange does not provide any real mitigation of the damage whatsoever. Further, if it were to do any possible good and have any chance to succeed in this extremely fragile, arid land, the exchange would have to be more like 50:1.


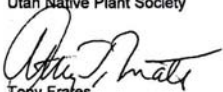
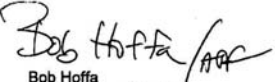

Furthermore, there is no scientific basis or evidence that is indicated in the biologic assessment that the highway will form a corridor to help protect the






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northernmost population of <i>Arctomecon humilis</i> on Warner Ridge. The fact is that this area is already at least partly fenced and a more appropriate mitigation action would be to fix the broken fence, add more fence where needed, patrol the area and increase public education. The highway will not fix the ORV/OHV problem, in fact, quite the opposite will occur. At least one interchange has been proposed for the area that will only INCREASE access to Warner Ridge, not decrease it.		In fact, the full cumulative impacts of the last 30 years have shown exactly these kinds of impacts, which are leading these species to the path of extinction. Until or unless the USF&WS designates critical habitat for these species, no further habitat on which the species, or their seeds, are found or are known to occur can be lost.	
We are unaware of a single instance where a highway has been proven to be a corridor for an endangered plant species and request explanation for that rationale, which we believe is entirely without basis. Richard Forman, one of the authors of the new book <i>Road Ecology: Science and Solutions</i> (Island Press, 2003), suggests that busy roads create an "avoidance zone" which is shunned by many types of wildlife and that it is not a good use of funds for conservation organizations to be protecting wildlife habitats next to busy roads. Heavily used roads fragment sensitive plant populations and habitats rather than protect them.	C-57.20	• BLM MANAGEMENT AT WARNER RIDGE AND ACEC CONFLICTS	C-57.23
	C-57.21	A highway should not be built through an area already designated as a federal "Area of Critical Environmental Concern," ACEC. The highway should completely avoid traversing any part of the three ACEC's in the corridor: Lower Virgin River, Red Bluff and Warner Ridge/Fort Pierce. Further, in the DEIS, p.4-99, it is stated that the project would allow the BLM "to better manage OHV access along Warner Ridge." It is not understood how this could possibly be true in view of the fact that the highway will bring greater access points, more fence that will likely not be kept in repair, more people who will use the equestrian/hiking trail for OHV use, at least one and maybe more new interchanges into the area.	C-57.24
• THE MOST KNOWLEDGABLE EXPERTS HAVE NOT BEEN CONSULTED		• NO PART OF THE PROJECT SHOULD INTERFERE WITH WHITE DOME	C-57.25
On page 4-82 of the DEIS the statement is made that "No trend data on plant species were available." This is simply not true. Drs. Harper and Van Buren have been collecting data in the area on these species for over ten years. The appropriate experts have not been consulted in the drafting of this DEIS. On page 4-89 it is stated that the "bearclaw poppy grows abundantly at White Dome." This is not true. White Dome, a critical habitat for <i>Arctomecon humilis</i> , has been (despite the efforts of the State Lands & Forestry in the 1980's), badly damaged by ORV/OHV use and while some plants do still grow there, they are by no means growing abundantly. Page 4-89 also refers to a fencing of White Dome, which is something we have always supported, but as far as we are aware is not contained in the Washington County habitat Conservation Plan.		• ROAD CONSTRUCTION WILL INCREASE INVASIVE SPECIES	
The BLM Arizona Strip Field Office has maintained a monitoring file for <i>Astragalus holmgrenorum</i> since 1988. The BLM Arizona Strip Field Office also maintains a monitoring file for <i>Pediocactus sileri</i> . These files should have been reviewed for the DEIS and trends therein stated in the DEIS.	C-57.22	Construction of the project will bring increased invasive species, which are a problem for several of the listed species, especially in view of the location of the highway proximate to these populations. The impacts of these invasive species on listed species, sensitive species and rare bee pollinators have not been analyzed in the DEIS.	C-57.26
• MITIGATION: NO HABITAT LOSS IS ACCEPTABLE		• CHEMICALS SPRAY IMPACT	
Last year's continued drought has created the worst ever germination for both the poppy and the milkvetch - these two species may be in the worst condition ever. Data is available showing population losses are as much as 75% (Shinob Kibe preserve) compared to two years ago. No further loss of habitat is acceptable to this species. DEIS page 4-99, for example, seems to imply that because of the claimed 0.1% impact to poppy habitat that the impact will be of no consequence.		To control invasive species mentioned above and in the rights of way proposed, it is presumed that chemical sprays may be used by UDOT to manage these areas. The impact of the use of these chemical sprays on rare bee pollinators as well on other sensitive wildlife (including plant species) has not been analyzed in the DEIS. Articles published by Vincent Tepedino need to be carefully studied (for example, <i>The Reproductive Biology of Rare Rangeland Plants and Their Vulnerability to Insecticides</i> - this article in fact includes information relating to <i>Arctomecon humilis</i> and <i>Pediocactus sileri</i> - see <a href="http://www.sidney.ars.usda.gov/grasshopper/Handbook/pdfs/Mont_III/III5.pdf">http://www.sidney.ars.usda.gov/grasshopper/Handbook/pdfs/Mont_III/III5.pdf</a> ). In conjunction with pollination biology studies, the appropriate "buffer zone" for the federally listed and other rare/sensitive species that will be impacted needs to be determined.	



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	C-57 (cont'd)		C-57 (cont'd)
TOXIC RUN-OFF FROM HIGHWAYS	C-57.27		C-57.33
Paragraph 6.4.3.2 acknowledges the toxic run-off from the new highway that will occur from rainstorms. Yet no analysis has been done to determine what impact this will have on rare bee pollinators as well as on other sensitive wildlife (including plant species).	C-57.28	<ul style="list-style-type: none"><li>• DEIS DOES NOT DISCLOSE FULL RANGE OF CUMLUATIVE IMPACTS</li></ul>	C-57.34
<ul style="list-style-type: none"><li>• RE-SURVEYS SHOULD OCCUR AT THE APPROPRIATE TIMES</li></ul>	C-57.29	Pages 2-24 thru 2-26 and C-21 in the DEIS discuss the "interchange" creep that will occur. No protection will later be afforded endangered wildlife and plant species as these interchanges are built and the DEIS is not properly determining the impact of these interchanges.	C-57.35
Re-surveys (see page 4-126 for example) need to be conducted at times when the listed species are in bloom. This includes early April to at least early June; the bloom times vary with the amount of precipitation.	C-57.30	Note that while on the one hand River Road is being avoided by the recommended alternatives, an interchange is being proposed with River Road under all of the build alternatives, the impact of which could be severe to the endangered and sensitive plant, bee and other wildlife species occurring in the area. Further, the Atkinville interchange appears to be designed for a "Western Corridor" that is not discussed nor its associated impact discussed in the study. The resulting combined impact of this could be devastating to the survival of the impacted species.	C-57.36
<ul style="list-style-type: none"><li>• RE-VEGETATION</li></ul>	C-57.31	We applaud SITLA for taking action to identify important habitat (see paragraph 4.14.3.1). However, they may have been misled into thinking that the only "sensitive" species were those that are federally listed and surveys for "sensitive" species identified elsewhere in this letter need to also be taken into consideration.	C-57.37
We support revegetation of native species, but they should be indigenous to Washington County (see for example page 4-126). Xeriscaping (see page 6-8) must be carefully managed to avoid using plants that are known to become invasive.	C-57.32	The negative impact to St. George businesses caused by diverting traffic to Zion National Park through the new corridor has not been analyzed.	C-57.38
<ul style="list-style-type: none"><li>• ORV STUDY NEEDED</li></ul>		<b>Summary</b>	
Construction of the highway will attract more people, more development, and lead to more ORV/OHV use, likely hastening the extinction of the rare plant species. Analysis of the impacts of increased ORV/OHV use needs to be done.		The purpose and need section of the DEIS for the proposed Southern Corridor does not substantiate and support the building of up to 28 miles of new road and as many as 18 new intersections. There are no alternatives analyzed in regard to the vast majority of the project. The "no build" alternative is invalid because it calls for the building of other roads. Further studies of sensitive, rare and threatened plant species as well as their seed-bank, soil, pollinators and habitat are called for to ensure their viability. Cumulative impacts have not been fully disclosed and studied. Mitigation measures to prevent impacts to endangered species are insufficient. Because of the inadequacies in the DEIS, any conclusions reached from the DEIS cannot be supported and are capricious and arbitrary.	
<ul style="list-style-type: none"><li>• POLICY OF OPEN SPACE INCREASES, NOT DECREASES THE AREA'S VALUE</li></ul>			
A retiree/service economy as acknowledged by the study dictates a policy and culture of open space which will increase, in the long term, property values as it will increase the desirability both to live and visit the St. George area. The study seems to fail to recognize this basic fact.			
<ul style="list-style-type: none"><li>• THE PROPOSED HIGHWAY IS HASTENING THE DEMISE OF A SENSITIVE AREA OF BIODIVERSITY OF WHICH THERE IS NO EQUAL IN UTAH</li></ul>			
The building of the corridor will spark development and will precipitate "sell-offs" of state lands that would otherwise not occur in the immediate future (White Dome for example) at artificially inflated prices. This will then more likely lead to a loss of habitat for rare and sensitive species.			
Cumulative Impacts:			
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<p>Thank you for considering our comments.</p> <p>Sincerely,</p> <p> William H. King Utah Native Plant Society</p> <p> Tony Frates Utah Native Plant Society</p> <p> Bob Hoffa Grand Canyon Trust</p> <p> Daniel R. Patterson Center for Biological Diversity</p> <p>CIK/UNPS</p> <p>12</p>	<p>C-57 (cont'd)</p>	<p><i>This space is intentionally blank.</i></p>	

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<div><p>United States Department of the Interior</p><p>OFFICE OF THE SECRETARY Washington, D.C. 20240</p><p>ER 03/369</p><p>MAY 30 2003</p><p>Mr. Greg Punske Project Development Engineer Federal Highway Administration Utah Division 2520 West 4700 South, Suite 9A Salt Lake City, UT 81448</p><p>Dear Mr. Punske:</p><p>The Department of the Interior has reviewed the Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation for the <i>Southern Corridor Construction</i> from I-15 near St. George to SR-9 near Hurricane in Washington County, Utah. We provide the following comments.</p><p><b>DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMENTS</b></p><p>Overall, the DEIS is organized, concise, and well-written. The DEIS illustrates that a thorough inventory of both recreational and cultural resources was completed, including a Wild and Scenic Rivers inventory.</p><p>The Department recognizes and appreciates the amount of public and agency involvement that was initiated by the Federal Highway Administration (FHWA) and the Utah Department of Transportation with affected parties including various State and local agencies and the public. We are pleased that the Utah State Historic Preservation Office and other cultural resource organizations have been consulted throughout the process and concur with your findings. We are also pleased that Native American consultation was conducted and that their requests were considered during the process.</p><p><b>SECTIONS 4(f)/6(f) EVALUATION COMMENTS</b></p><p><b>Page 3-17, Section 3.3.9 Recreation Resources:</b> The descriptions of the various recreation resources are informative and succinct; however, some of the descriptions do not explain who manages the land. We recommend that this information be included to help clarify which resources qualify as Section 4(f) properties.</p></div>	C-58	<div><p>-2-</p><p><b>Page 4-102, Section 4.15.1 Cultural Resources:</b> The first paragraph of this section states that a total of 89 sites are eligible for the National Register of Historic Places (NRHP); however, the text in the Affected Environment states that there are 85 NRHP-eligible sites. Please clarify the discrepancy. Also, the last sentence of this paragraph states that 9 sites are in the 3400 West area of potential effect, while Table 4.15-1 states that there are 69 sites. Again, please clarify the discrepancy.</p><p><b>SECTION 4(f)/6(f) EVALUATION COMMENTS</b></p><p>We appreciate that Section 6(f) resources have been analyzed and that the project will have no effect on Section 6(f) resources.</p><p>We are concerned that the Section 4(f) Evaluation does not adequately analyze the Section 4(f) properties located in the project area. We note in the DEIS a letter dated January 11, 2002, from the Department's Bureau of Land Management (BLM) providing a list of Section 4(f) properties in the project area; however, the Section 4(f) Evaluation dismisses many of these as being Section 4(f) properties. The Section 4(f) Evaluation also states that no Section 4(f) properties will be impacted, but the Environmental Consequences chapter of the DEIS states that many of the Section 4(f) properties identified by BLM will be directly or indirectly impacted by one or more of the alternatives.</p><p>Based on the above information, we suggest that a more complete Section 4(f) Evaluation be developed in accordance with the information BLM provided in their January 11, 2002 letter and the 1987 FHWA Section 4(f) Policy Paper. More specifically, we recommend the following:</p><ul style="list-style-type: none"><li>• Verify that all impacted Section 4(f) resources are analyzed in the Section 4(f) Evaluation. As a reminder, both existing and future planned resources can qualify as Section 4(f) properties.</li><li>• Impacts to each Section 4(f) property must be analyzed for each alternative carried forward, including a detailed analysis of the location, context, duration, and intensity of the impact. Impacts should be described according to the project's "use" and "constructive use" of the Section 4(f) property. This analysis is required for all types of impacts including beneficial or adverse, and temporary or permanent.</li></ul></div>	C-58 (cont'd)  C-58.2        C-58.3
	C-58.1		

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<p style="text-align: center;">-3-</p> <ul style="list-style-type: none"> <li>Avoidance alternatives must be addressed in order to demonstrate that there is no feasible and prudent alternative to the use of Section 4(f) properties. This includes different location alternatives and design shifts that avoid the use of that land.</li> <li>Mitigation measures need to be disclosed in the Section 4(f) Evaluation to show that the project includes all possible planning to minimize harm to Section 4(f) resources.</li> <li>A coordination section must be included to describe what public and agency involvement has occurred with regards to the Section 4(f) Evaluation. A conclusion section is also required.</li> <li>As for cultural resources, please discuss how you determined which archaeological sites warrant preservation in place. This should be conducted in consultation with the SHPO.</li> </ul> <p>Without the proper elements or sufficient information contained in the Section 4(f) Evaluation, we cannot concur with your findings at this time. We recommend that the Section 4(f) Evaluation provide a more adequate analysis of all impacted Section 4(f) properties in the project area, at which time we will be happy to provide an additional review for concurrence.</p> <p>For further information regarding cultural resources, please contact Cheryl Eckhardt, National Park Service, P. O. Box 25287, Denver, CO 80225, telephone: 303.969.2851.</p> <p>We appreciate the opportunity to provide these comments.</p> <p style="text-align: right;">Sincerely,            Willie R. Taylor          Director, Office of Environmental Policy          and Compliance</p>	<p>C-58 (cont'd)</p> <p>C-58.3</p>	<div style="text-align: center;">  <p><b>United States Department of the Interior</b>          BUREAU OF LAND MANAGEMENT          Arizona Strip Field Office          St. George Field Office          345 E. Riverside Drive          St. George, UT 84790          Phone (435) 688-3200 • FAX (435) 688-3258</p> </div> <p>In reply refer to:          1430-UT 100          (010)1100</p> <p style="text-align: right;">June 2, 2003</p> <p>Gregory Punske, Project Development Engineer          FHWA Utah Division          2520 West 4700 South, Suite 9A          Salt Lake City UT 84118</p> <p>Robert Dowell, Project Director          Utah Department of Transportation          1345 South 350 West          Richfield UT 84701</p> <p>Southern Corridor Project          HDR Engineering          3995 South 700 East, Suite 100          Salt Lake City UT 84107</p> <p><b>RE: FHWA-UT-EIS-03-01-D, UDOT SP-LC53(I)</b></p> <p>Gentlemen:</p> <p>The St. George Field Office (SGFO) and the Arizona Strip Field Office (ASFO) of the U.S. Department of the Interior, Bureau of Land Management (BLM) jointly submit this letter with our comments on the <u>Southern Corridor Draft Environmental Impact Statement and Section 4(f) Evaluation (DEIS)</u>. These are linked as closely as possible to relevant sections of the DEIS and are as follows:</p> <p><b>Summary and Chapter 1- Purpose of and Need for Action</b></p> <p>SGFO Comments:</p> <p>The SGFO manages public domain lands in Washington County, Utah, within and adjacent to the proposed project area for the Southern Corridor. BLM, through the SGFO, is a cooperating</p>	<p>C-59</p>



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agency for the federal environmental compliance process, under the National Environmental Policy Act (NEPA) and its implementing regulations, that has resulted in the preparation and release of this DEIS. This office also would have responsibility for granting a right-of-way, under authority of the Federal Land Policy and Management Act (FLPMA), for that segment of the Southern Corridor that is proposed to cross public domain lands in Washington County.

Public lands within the administrative area of SGFO are managed under objectives and decisions codified in the *St. George Record of Decision and Resource Management Plan*, (RMP), approved in March of 1999. No reference is made in the DEIS to this RMP, either in section 1.1.3.2 which describes "Local Planning Studies and General Plans" (page 1-5), or in section 3.1.3.1 "Local Land Use Plans (p. 3-3). In other sections of the DEIS (e.g., 4.12.2. Wildlife Habitat), management direction from the RMP for public lands within the proposed Southern Corridor study area is paraphrased, but no citations provided to indicate the source. Similarly, no references are made to applicable land use plans for the adjacent Arizona Strip public domain lands.

This is clearly a serious omission that must be corrected in the Final EIS, since the project area includes public lands that are subject to the St. George RMP. Actions proposed on public lands must be in conformance with management decisions contained in the applicable approved RMPs or, at a minimum, not conflict with those decisions. Any proposals for land uses that would not be in conformance with the RMP must be denied or the RMP amended. BLM requires that all NEPA documents disclose whether project proposals are in conformance with the approved RMP and provide specific citation(s) of the management decisions that relate to the proposal. A copy of the RMP was made available to HDR during the early phases of the DEIS preparation: the Southern [Transportation] Corridor, including a "bypass spur" along the Hurricane Cliffs to connect with SR 9, was identified in the RMP (ROW-LD-16, page 2.5) as "within the scope" of the SGFO RMP. If this EIS is to be adopted by SGFO BLM as its NEPA analysis to support the granting of a right-of-way across public lands for the project, this conformance screening must be included.

In the Summary section of the DEIS (S.1), the last sentence notes the project purpose of providing a regional transportation facility to "complement local land use plans." We believe that either the word *local* should be removed, or the reference should be expanded to include other relevant *state* and *federal* land use plans. Similarly, other sections of the DEIS that enumerate and describe land use plans applicable to the proposed project area (see above) should also be expanded to include state and federal plans.

The Summary chapter at S-2 also contains errata in the discussion of the multi-species Habitat Conservation Plan for Washington County, approved by the U.S. Fish and Wildlife Service in 1996. The now nearly 62,000-acre Red Cliffs Desert Reserve was established at that time, not "would be established" as the text here states.

ASFO Comments:

The ASFO manages public lands and resources immediately south of the DEIS study area on the

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"Arizona Strip". This is the region north and west of the Colorado River in Arizona. These BLM lands and resources are currently managed under a 1992 RMP. The ASFO is in the process of developing a new RMP and accompanying DEIS that will guide future management decisions. The Southern Corridor project could influence alternative development for the planning process on adjacent public lands of the Arizona Strip. The rapidly increasing urban development in Washington County, and associated land use and recreation pressures, have clear direct, indirect, and cumulative impacts on the BLM lands and resources south of the state line on the Arizona Strip. The DEIS generally fails to acknowledge, much less comprehensively address, both the resources and these potential impacts. While these impacts might be very similar to those analyzed in the DEIS for BLM lands and resources in Washington County, north of the state line, we believe that the DEIS should have nevertheless extended the analysis to include references to the Arizona Strip.

Where the proposed Southern Corridor leaves Interstate 15 and runs near or almost along the state line for some distance, the lands immediately adjacent to the south in Arizona are administered by Arizona State Lands. The DEIS should have referenced these state lands as well, along with the land use authority of Mohave County Arizona. The DEIS should have cumulatively analyzed the future prospects that these state lands within Mohave County may eventually be transferred into private ownership for development. Public lands managed by ASFO generally surround these state lands on the west, south, and east, and come to within about two or three miles of the Southern Corridor. This general area has already experienced increasing levels of public use, including the visible proliferation of off-road vehicle impacts.

As part of the revision process for the ASFO RMP, we have identified those Arizona Strip BLM lands proximate to the spreading development in the southern St. George Basin as an Urban Interface area. We anticipate that the future RMP will include specific decisions for this area relating to BLM's ability to implement projects, approve a variety of land tenure adjustments, and authorize recreational and other uses that will be requested or become necessary due to this development. It is crucial that all land use planning efforts by relevant federal, state, and local agencies in this region (on both sides of the state line) are effectively coordinated, so that adverse impacts associated with this rapid development will be avoided, reduced, and/or mitigated as much as possible. If this is not accomplished, a more piecemeal approach may result in an inadequate cumulative impacts analysis, poorly integrated developments, haphazard growth, unnecessary costs, and avoidable adverse impacts. We request that these concerns be thoroughly addressed in the Final Environmental Impact Statement (FEIS) for this proposed project.

Combined SGFO and ASFO Comments:

Chapter 2-Proposed Action and Alternatives

Page 2-5, paragraph 2, line 2 states that the "Red Cliffs Desert Reserve was established to protect the Mojave desert tortoise ... from future growth". This statement is syntactically awkward and somewhat misrepresents the need for and intent of the Reserve. Washington County developed its Habitat Conservation Plan (HCP) for the federally threatened Mojave desert tortoise and other

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<p>at-risk species. The HCP identified a number of management actions intended to assist the recovery and de-listing of the Mojave desert tortoise and prevent the need to list other species, including both wildlife and native plants. A critical component of the HCP was the establishment of a 'Reserve', where management would focus on protecting species from the direct and indirect effects of a variety of human activities, such as mining, utility corridor developments, roadways, landfills, certain recreation uses, residential and commercial construction, domestic livestock grazing, and other actions that can directly or indirectly impact sensitive species and their habitats. The threats and impacts were not just limited to "future growth". By protecting species and their habitats, through the various actions of the HCP including the management of the Reserve, Washington County is able to proceed with orderly growth and other development on private, municipal, and state lands in the county.</p> <p>On Figure 2-2 (Regional Alignment), the location of the study area is graphically depicted. This area appears to be arbitrarily narrow where it leaves Interstate 15 to stay north of the state line, and then it greatly expands in width as it proceeds north and northeast toward Hurricane. There is no explanation for this discrepancy in relative width along the study area. But the practical result is that the study area does not include, as it should, the relevant portion of the Arizona Strip. This fundamental defect should be corrected in the FEIS.</p> <p>Similarly, in Figure 2-5 (Other Alternatives Considered), there are three green cross-hatched polygons to indicate Holmgren Milkvetch habitat. Two of these polygons abruptly and arbitrarily terminate at the state line, without reference to whether they continue south of this line. Obviously, biological resources such as this plant species do not respect state boundaries, nor do the cumulative human impacts from the Southern Corridor project or other developments end at these legal boundaries. We believe that the FEIS must address and analyze possible impacts on the Holmgren Milkvetch and other resources on a holistic basis, regardless of the location of the state line.</p> <p><b>Chapter 3-Affected Environment</b></p> <p>This chapter uses the terms "study area" on an apparently <i>ad hoc</i> basis; the inconsistencies are confusing and unexplained. In describing some resources, the scale of the "study area" is broad and regional, reaching to the state line, sometimes south of that line, and extending to the county boundaries. For other resources, the use of "study area" describes the presumably smaller scale "project area". Consistency in terminology and some standardized definitions of terms are desperately needed here.</p> <p>As examples, the "study area" for data on the administrative status of lands includes Zion National Park and the Dixie National Forest, both units being located well outside possible project "footprint" of the Southern Corridor. Where paleontological resources are described, section 3.15.2.4 states that "no paleontological resources have been documented in the study area". If the study area is the broad regional area of southeastern Washington County, as the administrative status "study area" implies, then this is an inaccurate statement. Within the general "study area" in Warner Valley, BLM administers an interpreted dinosaur tracks site, fossil remains of scientific interest are also found in Zion National Park, on Smith Mesa, in</p>		<p>southeastern St. George (site of the Congressionally designated "Dinosaur Footprint Preserve"), and elsewhere in the broad "study area". Paragraph 2 of section 3.15.2.4 goes on to state: "a paleontological survey was completed for the study area". Again, this clearly means only the proposed "project area", rather than the larger regional area that is labeled the "study area" elsewhere in the DEIS.</p> <p>Similarly, the section on Wild and Scenic Rivers states that none occur in the "study area". If the study area is broad and regional, then this statement is not accurate: a number of river segments have been recently studied and recommended for inclusion in the National Wild and Scenic Rivers System, both on BLM-administered public lands and on federal lands managed by National Park Service. For Recreation Resources, section 3.3.9, the "study area" is defined as "any location where the Southern Corridor would open, limit, or potentially close access to recreation areas." Again, consistency in terminology and concepts would assist the reader here.</p> <p>Section 3.1.1 Paragraph 2.</p> <p>This section describes the administrative status of lands in the "study area", rather than the more restricted project area, and lists several federal agencies, including BLM, BIA, NPS and the (U.S. Department of Agriculture's) Forest Service. The following statements then focus on the Federal Land Policy and Management Act (note correct title) of 1976 (Public Law 94-579, 90 STAT 2743). It is unclear why FLPMA is called out for specific discussion here, since no linkage between that Act and BLM is offered.</p> <p>The terms "public lands" in this section of the DEIS are used collectively to include all "Federal lands, wilderness areas, state lands, and open space" (section 3.1.2-sentence 2). This usage is directly contrary to the definition provided in FLPMA, also referenced in this section. FLPMA provides legislative direction for "public lands" –by definition in that Act, those Federal "lands and interest in lands owned by the United States within the several States and administered by the Secretary of the Interior through the Bureau of Land Management". FLPMA does not apply to Federal lands administered by the U.S. Department of the Interior's NPS, BIA, or the USDA Forest Service, but rather only to "public lands administered by the Secretary of the Interior through BLM". This distinction is not made here nor is there a linkage made between FLPMA and BLM that would help the reader understand why FLPMA (as BLM's "organic act") is even discussed here.</p> <p>Further, as noted above, nowhere in the DEIS is any reference made to the FLPMA-generated St. George Field Office RMP (1999), the approved land use plan for BLM-administered public lands in Washington County that comprise a substantial percentage of the proposed Southern Corridor project area, nor to the Arizona Strip RMPs, currently undergoing new planning. These BLM RMPs were prepared to be consistent, to the extent possible, with local municipal and county plans.</p> <p>As we have noted in prior comments, public lands are "administered [not owned] by the Secretary of the Interior through the Bureau of Land Management". Ownership of these lands resides with the "United States". The DEIS should be globally changed to replace BLM-owned</p>	



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with "BLM-administered " where this usage remains.

Section 3.1.2 Existing Land Use

The last sentence of this section describes the "BLM-administered Beaver Dam Mountains Wilderness Area that [in Utah] is comprised of slightly less than 2,700 acres of public lands". The DEIS makes no mention of the substantially larger total acreage (15, 821 acres) of the designated Wilderness Area, which is contained in Arizona. The maps figures incorrectly label this as the "Beaver Mountain Wilderness Area" (e.g., Figure 3-2). Corrections need to be made to figures and text in the DEIS. The DEIS also does not reference other comparable significant designations in the same geographic region of Arizona, particularly the Paiute Wilderness Area and Grand Canyon-Parashant National Monument.

Section 3.1.3 "Local" Land Use Plans

See comment above regarding the need to include in this section those federal and state plans which provide management direction for lands within and adjacent to the proposed project area.

Figure 3-7 (BLM Grazing Allotments Within Study Area) only indicates allotments in Utah without referencing those within a similar geographic radius in the Arizona Strip. Please correct this omission in the FEIS.

Section 3.3.9 Recreational Resources

This section contains a number of errata and omissions concerning BLM-administered recreation resources in and near the project area. The section is also in need of revision to more logically order the resources and areas described. Paragraph 2, line one of the introductory section requires the addition of the following: "personal interviews with [recreation specialists] with state and federal [land managing] agencies".

In contrast to most other DEIS graphics, Figure 3-9 (Recreational Resources) *does* include references to some Arizona Strip features, such as the Dutchman and Sunshine Loop Trails. However, we believe that the FEIS should provide more thorough references to other proximate recreational designations in the ASFO 1992 RMP. For example, the annual Rhino Rally competitive motorcycle events have occurred on BLM lands on both sides of the state line.

Section 3.3.9.2

Suggested revisions to the Warner Ridge/Fort Pearce ACEC section:

"This BLM-administered ACEC was designated through the St. George RMP (1999) to provide special management attention to fragile resources on public lands within its boundaries, including the riparian zone of Fort Pearce Wash, endangered bear claw poppy populations and habitat, significant fossil resources, and National Register-eligible and listed properties. The National Register-listed historic Fort Pearce is an interpreted site within the ACEC that attracts

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many visitors interested in local history and heritage tourism. Similarly, the interpreted Dinosaur Trackway site is a popular environmental education destination within the ACEC. The ACEC is also managed to provide opportunities for diverse recreation uses, such as hiking, viewing wildlife, mountain biking, equestrian trail riding, and motorized vehicle uses, where consistent with the need to protect sensitive resources. Those portions of the ACEC that contain habitat and/or populations of the federally-endangered bear claw poppy are closed to motorized off-highway vehicle travel (OHV), as are the Fort Pearce historic site and the Dinosaur Trackway site. The ACEC is located within the boundaries of the larger Sand Mountain Special Recreation Management Area (SRMA)".

Additional descriptive information on the Fort Pearce and the Dinosaur Trackway sites, such as that already included in the DEIS could be added here.

Suggested revisions to description of the Sand Mountain Special Recreation Management Area:

"The Sand Mountain SRMA is a BLM-designated recreation area comprised on more than 40,000 acres of public lands. SRMAs are well-defined land units that support a combination of natural features, such as the sand dune complex of Sand Mountain, making them attractive and manageable for interrelated recreation opportunities on a sustained basis (SGFO RMP 1999:2.41). Visitor attractions within the Sand Mountain SRMA include OHV riding on the sand dunes, equestrian trail riding around Sand Mountain, hiking, wildlife viewing, and also those values, like historic Fort Pearce, contained in the Warner Ridge/Fort Pearce ACEC."

Errata, page 3-18, line 2: the Sand Hollow Recreation Area is comprised of private lands, surrounding the newly-constructed reservoir, as well as BLM-administered public lands within the Sand Mountain SRMA. State lands are also contained within the boundaries of the Recreation Area; these are administered by SITLA. A collaborative planning effort for the Sand Hollow Recreation Area, involving local recreational user groups, BLM, Utah Division of Parks and Recreation, state and local government representatives, and extensive public input, resulted in the preparation of the Sand Hollow Recreation Management Plan in 2001 to guide facilities development and other management actions in the new Recreation Area.

Errata: Dutchman and Sunshine Loop Trails on public lands administered by the BLM-ASFO in Arizona.

Honeymoon Trail

Errata: The Honeymoon Trail followed Fort Pearce Wash, so at least some portions of the trail are defined in the "project area" or "study area". The Trail is moderately used (not seldom) by equestrians, hikers, motorcyclists and ATV riders.

Dominguez-Escalante Trail/Old Spanish Trail

Additional information is needed here to address recent Congressional legislation (2003) that designated the Old Spanish Trail (OST) as part of the National Historic Trails (NHT) system. One of the alignments of the newly-designated NHT crosses public lands on the Arizona Strip,

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<p>near the Utah state line; another passes along the upper Santa Clara River and over Utah Hill in western Washington County, presumably within the "study area", but outside the proposed project area. Since the DEIS considers effects to historic trails and displays them on Figure 3-9, additional information on the recently designated OST, at least the alignment near the project area on the Arizona Strip, should be included and any project-related impacts also disclosed.</p> <p>Figure 3-16 (Visual Resources Key Observation Points) includes one point (KOP-1) just north of the state line, but none immediately south of the line. This is arbitrary because visual observations and resources are not changed by the presence of this line. We recommend that the FEIS provide some additional observation points at appropriate locations within the Arizona Strip looking north. The information from these points would explain how the visual resources would change for Arizona Strip visitors and users.</p> <p><b>Chapter 4-Environmental Consequences</b></p> <p>As with Chapter 3, there are many places in Chapter 4 (Environmental Consequences) where potential impacts on BLM-administered or state-owned lands on the Arizona Strip are ignored or given short shrift. Indeed, the arbitrary limit on the southern extent of the study area correlates with many of the missing or deficient analyses of impacts. For example, the discussion about the number and location of interchanges by alternative generally does not reference compatibility with the ASFO 1992 RMP decisions nor what these interchanges may portend for the new ASFO RMP planning process. The proposed interchange at River Road is instructive. River Road proceeds south and becomes a primary travel corridor that provides access deep into a more remote portion of the Arizona Strip, with connections to roads that extend into the new Grand Canyon-Parashant National Monument. Thus, the FEIS should address how the placement of interchanges near the state line, including one at River Road, may impact Arizona Strip resources and uses, even those farther to the south in more remote settings.</p> <p>Section 4.1.2 Consistency with Plans and Policies</p> <p>See comments above concerning BLM requirements for disclosing project conformance with management decisions from BLM's approved SGFO RMP (1999) and the need to include other applicable federal and state plans in relevant sections of the DEIS.</p> <p>4.14 Threatened and Endangered Species Impacts</p> <p>We question the discussion on page 4-86 that paraphrases management objectives and direction from the BLM's 1998 Proposed RMP (rather than the 1999 approved RMP, which is the land use plan of record). This section focuses its "analysis" not on the project-specific mitigation measures and/or environmental commitments developed for the Southern Corridor project and how those might lessen or eliminate project-related impacts on listed species, but rather on BLM's management objectives for listed species. This discussion appears to commit BLM and other federal agencies to being somehow "responsible" for mitigating the effects of the Southern Corridor on listed species. While BLM's approved SGFO RMP (1999) does articulate broad management goals and objectives for at risk species, these are not project-related mitigation, are</p>		<p>always subject to funding and staffing constraints, and may change over time, based on changing resource needs, legislative mandates, and other factors. BLM's overall management objectives for public lands would be more appropriately analyzed in the cumulative impacts section, not as substitute here for an analysis of project-related impacts and the efficacy of all proposed mitigation measures that are specific to the Southern Corridor project.</p> <p>Section 4.2.4 Livestock Grazing</p> <p>This analysis contains a number of errors. It also fails to include a scenario for analysis that was requested by BLM-SGFO, under which project-related effects to livestock grazing permit holders and their operations on public lands would have been mitigated through purchase and subsequent retirement of the grazing permits on those allotments where grazing operations would be substantially disrupted and potentially made less economically viable as a result of the disruptions. Also, we question whether any water development costs would have to be borne by the permit holder, since the need to replace or develop new water sources within affected allotments would have resulted from construction of the Southern Corridor. We believe this to be an erroneous conclusion.</p> <p>Section 4.2.4.1 Errata: Delete first sentence-incorrect. Base properties for livestock permits are not necessarily contiguous to public land allotments.</p> <p>Section 4.2.4.3 Errata: We do not believe that the State of Utah "would be required" to compensate grazing permit holders for lost AUMs or allotment improvements. The state could voluntarily negotiate with the permit holders to potentially compensate them for any lost improvements.</p> <p>Section 4.12.2. Wildlife Habitat</p> <p>Section 4.12.2.1</p> <p>In the analysis of the No Build (No Action) Alternative, the last paragraph of that section paraphrases language from the Proposed Dixie Field Office Resource Management Plan/ Final EIS (1998) as BLM's management objectives and direction for public lands and resources. Technically, since an approved RMP was put in place in 1999, the management objectives and direction must be derived from that plan, rather than the Proposed RMP. The approved RMP (1999) should be cited here.</p> <p>The DEIS' species-specific descriptions, including those in section 3.14.2 (Federally-listed species), generally only address the potential impacts on those species within the "study area". Some of these descriptions also summarize the status or trend of the species within Utah, without reference to their status or trend in Arizona. As previously noted, species do not respect state boundaries and the DEIS study area is arbitrarily narrow near the state line and does not address impacts south of this line. The concern is that some of these descriptions - particularly for the more mobile, sparsely distributed, rare, or wide-ranging species - may be incomplete or</p>	



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inaccurate. Since the biological status and requirements of these species are not affected by the presence of the state line or any other legal boundary on a map, the analysis should not be artificially limited by these lines. As such, the study area should be expanded southward in the FEIS, the Arizona status or trend should be added where appropriate, and these species-specific descriptions should be revised accordingly.

On the one hand, we recognize that even with the preceding revisions, in perhaps the vast majority of cases, the outcome of the analysis may not change due to the similarity of habitats on both sides of the state line and the relatively stable, localized use of these habitats.

On the other hand, we recognize that there are larger spatial scales beyond the scope of the DEIS "study area" that may be relevant for some species, but that were not considered in the DEIS. These species may tend to include those with large home ranges or the need for greater seasonal or elevational movements. It is important to analyze how impacts on both sides of the state line at this larger scale may cumulatively affect these species. This is necessary in light of the new scientific studies relating to landscape ecology and conservation biology. These studies demonstrate the importance of not only ignoring legal lines on maps when analyzing impacts on species, but also addressing the biological needs of different species at varying scales to move to find food, water, or shelter, escape predators, and reproduce. As you know, a project that directly or indirectly impedes such species movements may have far more serious impacts than those associated with the actual number of habitat acres physically converted for the project.

While the DEIS discusses wildlife movement and habitat fragmentation, it does not specifically address how the proposed alternatives and interchange locations may affect the meta-population dynamics of potentially vulnerable species. This includes whether the Southern Corridor project in combination with other developments will encircle or highly fragment habitats (such as those that sometimes remain on undeveloped lands, such as steep slopes and floodplains), or will significantly block the movement of some local species populations. Over time, these impacts could cumulatively cause inbreeding depression and "sink" populations (those where mortality exceeds recruitment). In turn, a combination of such "sink" populations can add up to local or even regional declines or extirpations for the affected species, and sometimes negatively contribute to the species overall status and trend throughout its range. It is obvious that the development patterns in the southern St. George Basin have the potential for much greater future disruption of species habitats and movements. These impacts will occur at several spatial scales, and may affect the future health and abundance of some species within the Arizona Strip.

Mitigation and Monitoring

Finally, we request that the FEIS include a comprehensive and detailed listing, in one location or appendix, of all of the proposed mitigation and monitoring activities or projects associated with the construction and maintenance of the Southern Corridor. This listing should describe which agency is responsible for implementing each proposed activity or project, the estimated amount and availability of funds and staff necessary for implementation, the timeline or schedule for initiating and completing implementation, and the monitoring that will be done to determine relative effectiveness. This listing should also describe what remedies exist, if any, in the event

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that a proposed activity or project is not funded, initiated, completed, or otherwise effective. The subjects of mitigation and monitoring are very important, and need this level of detail and accountability. Otherwise, the public may suspect that mitigation and monitoring commitments in the FEIS are vague, illusory, or not otherwise taken seriously by the responsible agencies.

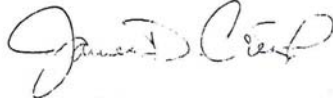
We greatly appreciate the opportunity to comment on this DEIS, and we request copies of the FEIS when it becomes available.

If you have any questions, or wish more detailed information on the ASFO 1992 RMP or the current ASFO RMP planning process, please contact Diana Hawks, Planning Coordinator, at (435) 688-3266 or Richard Spotts, Environmental Coordinator, at (435) 688-3207. If you have questions or need additional information concerning the SGFO RMP or comments from this office, kindly contact Dawna Ferris-Rowley, Asst. Field Office Manager at (435) 688-3216.


Sincerely,



Roger G. Taylor  
Arizona Strip Field Office Manager



James D. Crisp  
St. George Field Office Manager

	COMMENT NUMBER		COMMENT NUMBER
 <p>State of Utah</p> <p>MICHAEL O. LIAVITT <i>Governor</i></p> <p>OLENE S. WALKER <i>Lieutenant Governor</i></p> <p>GOVERNOR'S OFFICE OF PLANNING AND BUDGET</p> <p>WIS CURTIS <i>State Planning Coordinator</i></p> <p>Resource Development Coordinating Committee</p> <p>JOHN A. HANJA <i>Executive Director</i></p> <p>GLADIE SOWARDS <i>Committee Chairman</i></p> <p>May 30, 2003</p> <p>Gregory Punske, Project Development Engineer FHWA Utah Division 2520 West 4700 South, Suite 9A Salt Lake City, Utah 84118</p> <p>SUBJECT: Southern Corridor Draft Environmental Impact Statement Project No. 03-2729</p> <p>Dear Mr. Punske:</p> <p>The Resource Development Coordinating Committee (RDCC), representing the State of Utah, has reviewed this proposal. State agencies' comments are as follows:</p> <p><b>Department of Natural Resources</b></p> <p>The Utah Department of Natural Resources appreciates the opportunity to review the above referenced document and provides the following comments. The comments reflect input from several divisions within the department.</p> <p>Utah Geological Survey personnel have noted that the DEIS, page 3-59, indicates that a paleontological survey was completed and refers the reader to Appendix H (Cultural and Paleontological Resources) for the survey report. However, Appendix H includes the results of only the Cultural Resources Survey that was conducted by Montgomery Archaeological Consultants, and does not include results from the Paleontological Survey Report conducted by A. Hamblin as a subcontract to the above report. This report includes an expanded list of geologic formations exposed in the project area that have the potential for yielding significant fossil localities, including the Jurassic Moenave and Kayenta Formations. These formations should be added to paragraph 1 of Section 3.15.2.4 (Paleontological Resources Inventory) at page 3-59. In addition, although paleontological mitigation recommendations are included in Section 4.15 (Impacts on Historic, Archaeological, and Paleontological Resources), page 4-101, the Paleontology Report, or a summary, should be included in Appendix H for completeness, and to accurately reflect the title of Appendix H.</p> <p>For completeness and balance, impacts on future energy and mineral development should be addressed in the DEIS. Generally new or improved road access benefits energy and mineral development. Careful route planning can provide topographic screening of existing and potential development sites, which will make development more palatable to the public. Oil has been produced in small quantities from the Pennsylvanian Calville Limestone at the Anderson Junction field northeast of Toquerville and from the Triassic Moenkopi Formation at the Virgin</p>	C-60	<p>Page 2</p> <p>field northeast of the town of Virgin. The Calville Limestone, Moenkopi Formation and other stratigraphic units have speculative potential in other parts of Washington County. Much of Washington County has geothermal potential. The Southern Corridor area also has significant resources of sand and gravel, crushed stone, building stone, ornamental stone and silica sand.</p> <p>Potential geologic hazards in the region that could affect the alignments may include slope instability (landslides, rockfall) and problem soils (shrink/swell and/or collapsible). The Utah Department of Transportation may want to consider geologic hazards at this point in the decision-making process as part of the feasibility analysis and safety evaluations. The Utah Geological Survey has general hazards information available for review at their offices.</p> <p>The Utah Division of Parks and Recreation (State Parks) has expressed concern about Alternative D, the proposed 2800 West alignment as described in section 2.2.4, page 2-26 of the DEIS and the resulting effects on the recently dedicated Sand Hollow State Park.</p> <p>State Parks personnel reviewed the DEIS as managers of Sand Hollow State Park with the responsibility of providing a positive experience for those who visit and recreate at the park. Consequently, while State Parks personnel support the project in general, they are concerned that the proposed 2800 West alignment, which runs directly through the park, would not be consistent with the needs of the park and would have negative impacts on park visitors, park resources and proposed future park development.</p> <p>If implemented, the 2800 West alignment would create potential physical and esthetic barriers separating the reservoir area from the Sand Mountain portion of the park and blocking recreational access. This is inconsistent with park planning efforts calling for more open recreational access and opportunities to the Sand Mountain parcel within the park, as reflected in the <i>Sand Hollow Recreation Area Recreation Management Plan</i> (September 2001). The 2800 West alignment would likely require relocation of the proposed OHV campground and facilities at the foot of Sand Mountain and would negatively impact OHV use that occurs in this area. The park setting also would be altered significantly.</p> <p>The 4300 West or 3400 West alignments would have less of an impact on the park since these routes would not encroach park boundaries. For these reasons, State Parks has recommended that the 4300/3400 West, 4300 West and the 3400 West alignment alternatives, as outlined in the DEIS, be considered as favorable alignment alternatives for implementation in the area near Sand Hollow State Park.</p> <p>The department concurs with the concerns identified by State Parks regarding the 2800 West alignment. Additionally, the department concludes that the DEIS document itself does not adequately address the potential impacts of the proposed 2800 West alignment on Sand Hollow State Park. The DEIS addresses the "proposed Sand Hollow Recreation Area" (DEIS, page 3-3) but does not acknowledge the Sand Hollow State Park.</p> <p>The DEIS references the <i>Sand Hollow Recreation Area Recreation Management Plan</i> (May 2001) and includes as Figure 5-2 at page 5-9, Plate 7: Proposed Facilities, from the recreation management plan. However, the DEIS does not include Plate 6: Potential Recreation Opportunities, from the recreation management plan, which more accurately represents the planned development of Sand Hollow State Park. This information is necessary to adequately</p>	C-60 (cont'd)
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assess the potential impacts to the state park.  
The department recommends that the DEIS be revised to adequately consider Sand Hollow State Park in the analysis.

**Division of Air Quality**  
The proposed project, known generally as the Southern Corridor highway and replacement St George airport, may require a permit, known as an Approval Order, from the Utah Division of Air Quality (UDAQ). If any rock crushing plants, asphalt plants, or concrete batch plants are located at the site, an Approval Order from the UDAQ will be required for operation of the equipment. A permit application, known as a Notice of Intent (NOI), should be submitted to the Executive Secretary at the UDAQ at 150 N. 1950 West, SLC, UT, 84116 for review according to Utah Air Conservation Rule R307-400, Permits, Notice of Intent and Approval Order. In addition, the project is subject to R307-205-3, Fugitive Dust, since the project will have a short-term impact on air quality due to the fugitive dust that is generated during the excavation and construction phases of the project. An Approval Order is not required solely for the control of fugitive dust, but steps need to be taken to minimize fugitive dust, such as, watering and/or chemical stabilization, providing vegetative or synthetic cover and windbreaks. A copy of the rules are found at [www.rules.utah.gov/publicat/code/r307/r307.htm](http://www.rules.utah.gov/publicat/code/r307/r307.htm).

The Committee appreciates the opportunity to review this proposal. Please direct any other written questions regarding this correspondence to the Resource Development Coordinating Committee at the above address or call Carolyn Wright at (801) 538-5535 or myself at (801) 538-5559.

Sincerely,  
  
John Harja  
Executive Director  
Resource Development Coordinating Committee



May 27, 2003

Mr. Robert Dowell, P.E.  
UDOT Region 4  
1345 South 350 West  
Richfield, UT 84701

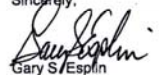
Dear Robert:

The City of St. George has the following comments on the Southern Corridor Draft EIS:

Section 6.6 indicates that the City is in the process of revising its Land Use Plan and has a Draft General Plan. On July 11, 2002, the St. George City Council adopted the revised and updated General Plan for land use development in the City. The plan contains numerous policy statements incorporating smart growth concepts designed to preserve open space and promote water and energy conservation.

In 1996 the 62,000 acre Red Cliffs Desert Reserve was created under the premise that creation of the Reserve would free up the other private lands within the City for development. This has shifted development to other areas of the City including the South Block located along the Utah-Arizona border. For many years, the City has been coordinating planning efforts with major land owners in this area such as Leucadia and the State Institution and Trust Lands Administration to establish a detailed Master Plan for development. Any effort to expand reserve concepts into other areas of the City would undermine the integrity of development concepts established when the Red Cliffs Desert Reserve was implemented.

The City of St. George supports and encourages development of the Southern Corridor highway because it will provide for a more efficient and functional transportation system in the southern part of the City and will ultimately be part of a beltway around the region.

Sincerely,  
  
Gary S. Esplin  
City Manager

<b>CITY OF ST. GEORGE</b> 175 East 200 North, St. George, Utah 84770 (435) 634-5800 <a href="http://www.ci.st-george.ut.us">www.ci.st-george.ut.us</a>	<b>MAYOR</b> Daniel D. McArthur	<b>CITY MANAGER</b> Gary S. Esplin	<b>CITY COUNCIL</b> Sharon L. Isom, Suzanne B. Allen, Larry H. Gardner, Robert Whatcott, Rodney Orton
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## Southern Corridor Final EIS

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- completed by the time it is needed. However, once it reaches the airport, it is equally important not to let it die at that point, but to continue in on to S.R. 9.
- The County recognizes that the majority of the southern corridor is located in the cities of St. George, Washington, and Hurricane with comparatively small portions being located in the unincorporated County area. It is also a fact that it was Washington County who originally created the southern corridor committee under former commissioner Jerry B. Lewis, now serving on the UDOT Board, to look at the feasibility of creating a highway from S.R. 59 near Hildale to I-15. We still feel that this road is needed, and that the planning and eventual construction of this route will not serve to let planners forget about the original goal of a roadway across the southern end of the County.
  - As to the three alternatives proposed for the Hurricane portion of the roadway as it ties into S.R. 9, we recognize that this is primarily a Hurricane City decision inasmuch as it is located within their City. We would accept any of those three alignments, but our preference frankly would be for the 4300 west alignment for the following reasons:
    - Because of the increased cost and distance of the alternative connecting to 2600 West, and the fact that it forces traffic around the Sand Hollow Reservoir, we would indicate that this would be our third choice of an alignment. The simple cost of constructing this road at the scale proposed from the Washington Dam road area to the top of the bluff west of the reservoir would, in our mind be comparable to constructing S.R. 9 from the intersection of Old Highway 91 to the Virgin River. A very difficult, costly, and unnecessary expense.
    - Because of the extra time and distance involved, we would expect that it would carry a significantly less amount of traffic across the County, nullifying the one most important reason for building the road, that of moving traffic.
    - We have no particular problem with the 3400 West alignment except that it goes through the approximate center of what will surely become a large-scale development. This alignment could cause problems with future development.
    - The further west the connection to S.R. 9 is made, the more traffic that will use that route which will better help to spread traffic through County.
  - We are confident that the area that will be served by the southern corridor will be developed with or without this important artery. To develop that much presently vacant land and to add that much additional population to the southern valleys of the County without major traffic carriers, will bring about the gridlock we spoke about earlier.

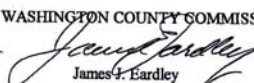
Robert Dowell - 3


- We cannot over emphasize the importance of regional planning for transportation throughout the southern part of the County. Four of the cities are identified as a metropolitan planning area. The technical staff of these cities, along with Hurricane, have been trying to address traffic problems, identify common routes, coordinate street locations and design standards, etc., for several years now. This corridor is an important part of the planning effort. In addition to the alignment from I-15 to S. R. 9, we hope that the department of transportation will not forget about the alignment from I-15 to Santa Clara and Ivins on the west side of the valley. That segment of the corridor is also badly needed for the long-range development of these areas. Perhaps when this study is finally approved, UDOT might consider doing a similar study for the area west of I-15
  - It is important that this corridor be identified and protected from development at this point. It will be difficult enough to construct the roadway if the corridor is protected, let alone the problems that it would bring if development was allowed and developed land had to be purchased for a right-of-way.
  - Finally, we would like to make the point that for many years there was a roadway planned from what is now the Snow Canyon Parkway to I-15 at about the proposed mile post 13 interchange. In fact, the County once started to cut this road in but it was never carried to the point of completion. When the Desert Tortoise HCP plan was put in place, it eliminated, for all intents and purposes, the likelihood that this roadway will ever be built in the form it was originally planned.
- One of the major considerations in the County in working on the habitat conservation plan was that it would free up the balance of the County to allow development to continue. We recognize that there are some problems particularly with endangered plants and possibly an eagles nest in the southern corridor alignment, but we think that these should be looked at as minor when considering that we gave up 60-70,000 acres of land north of the cities, most of which had good potential for development, in order to allow development elsewhere. We have done that in good faith and would hate to think that the environmental community would seriously attempt to stop construction of this roadway after what we have already given up.
- We appreciate the work that you have done in guiding the southern corridor committee through the environmental impact process and in keeping this work on track in spite of the setbacks that have occurred along the way. We encourage you to continue to oversee this project to its final conclusion and approval by the federal agencies, and then to promote insofar as you are able, the funding to allow the actual construction of the southern corridor.

Sincerely,

THE WASHINGTON COUNTY COMMISSION

 Alan D. Gardner

 James J. Eardley

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COMMENT NUMBER	COMMENT NUMBER
C-64	C-65
<p><b>From:</b> gfro@yahoo.com [mailto:gfro@yahoo.com]  <b>Sent:</b> Fri 6/20/2003 9:44 AM  <b>To:</b> Donegan, Nicole  <b>Subject:</b> UDOT Southern Highway Plans</p> <p>Dear Mr. Punske,</p> <p>I urge you to go back to the drawing board with your Draft Environmental Impact Statement (DEIS) on the Southern Corridor. The study is inadequate for several reasons. The three alternatives studied do not provide a reasonable range of alternatives: they are three insignificantly-differentiated versions of the same bad plan. Although the DEIS includes a section on smart growth, this project is tiered to the expectation that Washington County will not use any smart growth planning. In fact, the DEIS acknowledges no impact from public transportation--not even in the year 2030! It's very important to give citizens and policy makers a smart growth alternative that would save water, reduce air pollution, improve quality of life and diminish impacts to plants and wildlife.</p> <p>Although in the DEIS you make an admirable argument for smart growth, this project will in fact promote low-density, leapfrog developments while increasing the value of state lands, and private lands belonging to a cozy group of multi-millionaire land speculators. The DEIS fails to make an adequate connection between the traffic needs generated by your model and the solution you've chosen. By your own admission, the build alternatives would INCREASE traffic congestion on seven of thirty-three segments studied versus the no-build alternative.</p> <p>This project would also have devastating impacts on three endangered plant species. These plants have experienced serious habitat loss through development, drought and habitat degradation from off-road vehicles. This highway could be the death knell for the plants whose numbers are already down seriously before the project.</p> <p>Sincerely,  gregg  gfro@yahoo.com</p>	<p><b>From:</b> davidorr@aol.com [mailto:davidorr@aol.com]  <b>Sent:</b> Fri 6/20/2003 1:39 PM  <b>To:</b> Donegan, Nicole  <b>Subject:</b> UDOT Southern Highway Plans</p> <p>Dear Mr. Punske,</p> <p>I urge you to go back to the drawing board with your Draft Environmental Impact Statement (DEIS) on the Southern Corridor. The study is inadequate for several reasons. The three alternatives studied do not provide a reasonable range of alternatives: they are three insignificantly-differentiated versions of the same bad plan. Although the DEIS includes a section on smart growth, this project is tiered to the expectation that Washington County will not use any smart growth planning. In fact, the DEIS acknowledges no impact from public transportation--not even in the year 2030! It's very important to give citizens and policy makers a smart growth alternative that would save water, reduce air pollution, improve quality of life and diminish impacts to plants and wildlife.</p> <p>Although in the DEIS you make an admirable argument for smart growth, this project will in fact promote low-density, leapfrog developments while increasing the value of state lands, and private lands belonging to a cozy group of multi-millionaire land speculators. The DEIS fails to make an adequate connection between the traffic needs generated by your model and the solution you've chosen. By your own admission, the build alternatives would INCREASE traffic congestion on seven of thirty-three segments studied versus the no-build alternative.</p> <p>This project would also have devastating impacts on three endangered plant species. These plants have experienced serious habitat loss through development, drought and habitat degradation from off-road vehicles. This highway could be the death knell for the plants whose numbers are already down seriously before the project.</p> <p>Sincerely,  David Orr  davidorr@aol.com</p>



COMMENT  
NUMBER

C-66

**From:** mills018@yahoo.com [mailto:mills018@yahoo.com]  
**Sent:** Fri 6/20/2003 11:27 PM  
**To:** Donegan, Nicole  
**Subject:** UDOT Southern Highway Plans

Dear Mr. Punske,

I urge you to go back to the drawing board with your Draft Environmental Impact Statement (DEIS) on the Southern Corridor. The study is inadequate for several reasons. The three alternatives studied do not provide a reasonable range of alternatives: they are three insignificantly-differentiated versions of the same bad plan. Although the DEIS includes a section on smart growth, this project is tiered to the expectation that Washington County will not use any smart growth planning. In fact, the DEIS acknowledges no impact from public transportation--not even in the year 2030! It's very important to give citizens and policy makers a smart growth alternative that would save water, reduce air pollution, improve quality of life and diminish impacts to plants and wildlife.

Although in the DEIS you make an admirable argument for smart growth, this project will in fact promote low-density, leapfrog developments while increasing the value of state lands, and private lands belonging to a cozy group of multi-millionaire land speculators. The DEIS fails to make an adequate connection between the traffic needs generated by your model and the solution you've chosen. By your own admission, the build alternatives would INCREASE traffic congestion on seven of thirty-three segments studied versus the no-build alternative.

This project would also have devastating impacts on three endangered plant species. These plants have experienced serious habitat loss through development, drought and habitat degradation from off-road vehicles. This highway could be the death knell for the plants whose numbers are already down seriously before the project.

Sincerely,  
Lisa Mills  
mills018@yahoo.com

COMMENT  
NUMBER

C-67

**From:** folkgrri78@aol.com [mailto:folkgrri78@aol.com]  
**Sent:** Sat 6/21/2003 3:25 PM  
**To:** Donegan, Nicole  
**Subject:** UDOT Southern Highway Plans

Dear Mr. Punske,

I urge you to go back to the drawing board with your Draft Environmental Impact Statement (DEIS) on the Southern Corridor. The study is inadequate for several reasons. The three alternatives studied do not provide a reasonable range of alternatives: they are three insignificantly-differentiated versions of the same bad plan. Although the DEIS includes a section on smart growth, this project is tiered to the expectation that Washington County will not use any smart growth planning. In fact, the DEIS acknowledges no impact from public transportation--not even in the year 2030! It's very important to give citizens and policy makers a smart growth alternative that would save water, reduce air pollution, improve quality of life and diminish impacts to plants and wildlife.

Although in the DEIS you make an admirable argument for smart growth, this project will in fact promote low-density, leapfrog developments while increasing the value of state lands, and private lands belonging to a cozy group of multi-millionaire land speculators. The DEIS fails to make an adequate connection between the traffic needs generated by your model and the solution you've chosen. By your own admission, the build alternatives would INCREASE traffic congestion on seven of thirty-three segments studied versus the no-build alternative.

This project would also have devastating impacts on three endangered plant species. These plants have experienced serious habitat loss through development, drought and habitat degradation from off-road vehicles. This highway could be the death knell for the plants whose numbers are already down seriously before the project.

Sincerely,  
Maria Tilelli  
folkgrri78@aol.com

	COMMENT NUMBER		COMMENT NUMBER
<p><b>Donegan, Nicole</b></p> <hr/> <p><b>To:</b> Izzo, Vincent; Ulrich, Carrie L. <b>Subject:</b> FW: UDOT Southern Highway Plans</p> <p>-----Original Message----- From: jere.gimbel@skiutahlocals.com [mailto:jere.gimbel@skiutahlocals.com] Sent: Saturday, July 05, 2003 8:11 PM To: Donegan, Nicole Subject: UDOT Southern Highway Plans</p> <p>Dear Mr. Punske,</p> <p>Please allow the forward progress of a highway between a new interchange on I-15 south of Bloomington and State Route 9 on the west side of Hurricane.</p> <p>Thanks,</p> <p>jere gimbel jere.gimbel@skiutahlocals.comSincerely, jere gimbel jere.gimbel@skiutahlocals.com</p> <p>1</p>	<p>C-68</p> <p>C-68.1</p>	<p><b>Donegan, Nicole</b></p> <hr/> <p><b>To:</b> Izzo, Vincent; Ulrich, Carrie L. <b>Subject:</b> FW: UDOT Southern Highway Plans</p> <p>-----Original Message----- From: utjanetg@network.com [mailto:utjanetg@network.com] Sent: Sunday, July 06, 2003 2:00 PM To: Donegan, Nicole Subject: UDOT Southern Highway Plans</p> <p>Dear Mr. Punske,</p> <p>I urge you to go back to the drawing board with your Draft Environmental Impact Statement (DEIS) on the Southern Corridor. The study is inadequate for several reasons. The three alternatives studied do not provide a reasonable range of alternatives: they are three insignificantly-differentiated versions of the same bad plan. Although the DEIS includes a section on smart growth, this project is tiered to the expectation that Washington County will not use any smart growth planning. In fact, the DEIS acknowledges no impact from public transportation--not even in the year 2030! It's very important to give citizens and policy makers a smart growth alternative that would save water, reduce air pollution, improve quality of life and diminish impacts to plants and wildlife.</p> <p>Although in the DEIS you make an admirable argument for smart growth, this project will in fact promote low-density, leapfrog developments while increasing the value of state lands, and private lands belonging to a cozy group of multi-millionaire land speculators. The DEIS fails to make an adequate connection between the traffic needs generated by your model and the solution you've chosen. By your own admission, the build alternatives would INCREASE traffic congestion on seven of thirty-three segments studied versus the no-build alternative.</p> <p>This project would also have devastating impacts on three endangered plant species. These plants have experienced serious habitat loss through development, drought and habitat degradation from off-road vehicles. This highway could be the death knell for the plants whose numbers are already down seriously before the project. My husband is a well-known lepidopterist who has extensively studied butterfly habitat in southern Utah and is appalled by the lack of foresight in planning principles and actions exhibited by the devastating effects now present in Washington County. So many butterflies no longer have the foodplants they need to survive - they have been bulldozed down to make room for more businesses and housing developments, along with the disappearing mesas, plateaus, and buttes. When you describe beautiful, natural, striking landmarks as "physical constraints" to roadbuilding, you illustrate my point exactly! Southern Utah used to be a haven for tranquility, wilderness, and appreciation of the beauties of nature. Now it's an extension of the urban sprawl found in abundance in California - are we surprised that other states' residents retire in our more pristine environment? But if we keep promoting development sprawl, we will no longer have this lovely country to enjoy, nor will others - it just won't be there anymore. And where is the water going to come from to meet the needs of the increased population which will fill all those housing developments - already the citizens of little towns such as LaVerkin and Toquerville have had their spring waters diverted from them to be used elsewhere by more affluent, privileged users, and now those little towns will have inferior-quality water piped in to them! What we don't need is to provide more</p> <p>1</p>	<p>C-69</p> <p>C-69.1</p> <p>C-69.2</p> <p>C-69.3</p> <p>C-69.4</p> <p>C-69.5</p> <p>C-69.6</p>

COMMENT  
NUMBER

C-69  
(cont'd)

opportunities for over-use of our diminishing resources, which is exactly what would happen with the construction of this proposed freeway. Sincerely,  
Janet Gillette  
utjanetg@networld.com

2

Donegan, Nicole

From: kirstenshaw@mail.com  
Sent: Wednesday, July 09, 2003 4:57 PM  
To: Donegan, Nicole  
Subject: UDOT Southern Highway Plans

Dear Mr. Punske,

I urge you to go back to the drawing board with your Draft Environmental Impact Statement (DEIS) on the Southern Corridor. The study is inadequate for several reasons. The three alternatives studied do not provide a reasonable range of alternatives; they are three insignificantly-differentiated versions of the same bad plan. Although the DEIS includes a section on smart growth, this project is tiered to the expectation that Washington County will not use any smart growth planning. In fact, the DEIS acknowledges no impact from public transportation--not even in the year 2030! It's very important to give citizens and policy makers a smart growth alternative that would save water, reduce air pollution, improve quality of life and diminish impacts to plants and wildlife.

Although in the DEIS you make an admirable argument for smart growth, this project will in fact promote low-density, leapfrog developments while increasing the value of state lands, and private lands belonging to a cozy group of multi-millionaire land speculators. The DEIS fails to make an adequate connection between the traffic needs generated by your model and the solution you've chosen. By your own admission, the build alternatives would INCREASE traffic congestion on seven of thirty-three segments studied versus the no-build alternative.

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Sincerely,  
kirsten shaw fox  
kirstenshaw@mail.com

1

COMMENT  
NUMBER

C-70



	COMMENT NUMBER		COMMENT NUMBER
 <p>United States Department of the Interior FISH AND WILDLIFE SERVICE UTAH FIELD OFFICE 2369 WEST ORTON CIRCLE, SUITE 50 WEST VALLEY CITY, UTAH 84119</p> <p>In Reply Refer To FWS/R6 ES/UT 03-0453</p> <p>July 11, 2003</p> <p>Gregory Punske Federal Highway Administration 2521 West 4700 South Suite9A Salt Lake City, Utah 94118</p> <p>Dear Mr. Punske:</p> <p>RE: Southern Corridor Draft Environmental Impact Statement</p> <p>The U.S. Fish and Wildlife Service, Utah Field Office, has reviewed the Draft Environmental Impact Statement for the proposed Southern Corridor Highway (Southern Corridor DEIS) in southern Washington County, Utah. We believe the 4300 West Alternative would have the least impact to wildlife habitat. We would like to offer the following comments:</p> <p><b>General Comments</b></p> <p>Our comments focus on impacts to fish and wildlife and their habitat including endangered and threatened animals and plants. We are a cooperating agency in the preparation of the Southern Corridor DEIS and as such have had the opportunity to suggest alternatives and modifications to the proposed action, most of which were incorporated. We appreciate this collaboration and cooperation.</p> <p>Our major concerns include the loss of individual Federally listed plants and animals and their habitat; impacts to wildlife species in general; and impacts to high value wildlife habitat areas including wetland, riparian, and aquatic habitat. We had previously provided you a biological opinion for impacts to Federally listed plant and animals. We note that you have included that document in the Southern Corridor DEIS and have incorporated our conservation measures as mitigation measures in the text of the document.</p> <p>We note that high value wildlife habitat areas at the north end of Warner Ridge near the floodplain of the Virgin River and the Willow Springs wetland areas were avoided in the proposed highway alignment. Highway alignment in intermittent desert wash habitat near Atkinville Wash and Fort Pierce Wash was kept to a minimum. The highway alignment north of Atkinville Wash was sited to minimize impacts to the Federally listed plant species <i>Astragalus holmgreniorum</i> (Holmgren milk-vetch) and its habitat. The highway alignment south of the</p>	C-71	<p>White Dome was similarly sited to minimize impacts to the Federally listed plant species <i>Arctomecon humilis</i> (dwarf bear-poppy) and <i>Pediocactus sileri</i> (Siler pincushion cactus). In addition the proposed Southern Corridor Highway and its right of way fence in these two highway segments is sited to provide a portion of a protective barrier for potential preserves for these three species. The proposed highway alignment from its junction with the Warner Valley Road to the north end of Warner Ridge is sited to provide a protective barrier to a portion of the <i>A. humilis</i> population on Warner Ridge.</p> <p>We are concerned about the fragmentation of natural wildlife habitat unavoidably cause by roads. To minimize those impacts to small mammals and reptiles we suggest the liberal utilization of passage structures (i.e. large culverts, bridges etc.) at all significant wildlife crossing points of the proposed highway. Many, but not all, of these passage structures would have a dual use as necessary drainage structures. Regular drainage structures should be evaluated for and, if need be, modified for this dual use. In addition to small terrestrial vertebrates, we have a concern for insect pollinators, especially for the listed plant species discussed above. Fragmentation of natural wild land habitat has the potential to reduce genetic flow between populations of native species including plants. This can be critical to the long term viability of rare plants such as those Federally listed species in the vicinity of the Southern Corridor Highway. In the future we expect that much of the natural wild land habitat adjacent to the Southern Corridor Highway will be developed for commercial, residential and industrial uses. This will further isolate populations of those federally listed rare plant populations not directly displaced by those developments. The highway right of way outside the area physically occupied by the highway should be managed as a corridor for pollinator movement throughout the entire length of the proposed highway especially at the western segment near Atkinville Wash and White Dome and central segment near Warner Ridge. At present we do not have any specific conservation recommendations for the highway right of way other than leaving it in its natural state. However, we will continue to discuss this issue as new information becomes available.</p> <p>We believe the 4300 West alternative has the least impacts to wildlife due to its shorter length and thus lesser impact to natural wildlife habitat. The 2800 West alternative conversely would have the greatest negative impact to wildlife due to its greater length and the fact that its additional length is a function of its passing near the Sand Hollow Reservoir and adjacent natural wild lands of its surrounding Utah State Park.</p> <p><b>Specific Comments</b></p> <p>The following are specific suggestions keyed to the text of the Southern Corridor DEIS:</p> <p>page 3-48; <i>Pediocactus sileri</i> is Federally listed as threatened not endangered.</p> <p>page 4-72; add African mustard (<i>Malcolmia africana</i>) to the list of invasive weeds.</p> <p>page 4-86; change "May affect, not likely to affect" to "May affect, not likely to adversely affect".</p>	<p>C-71 (cont'd)</p> <p>C-71.1</p> <p>C-71.2</p> <p>C-71.3</p> <p>C-71.4</p>

COMMENT  
NUMBER

C-71  
(cont'd)


page 4-100; change Holmgren milk-vetch habitat ratio of BLM to State Land from 44% : 66% to 44% : 56%.

page 4-122; FWS incidental take permits apply to animals only, not plants.

This concludes the Fish and Wildlife Services comments to the Southern Corridor DEIS. If you have any questions please contact me or Larry England, botanist, at 801/975-3330

Sincerely

**LARRY W. CRIST**

 Henry R. Maddux  
Utah Field Supervisor

cc: FWS/R6 - Denver, CO (Attn.: Connie Young, Regional NEPA Coordinator)

bcc: Project file  
Reading file

ENGLAND/tsb:7/11/03  
file: USDOT/FHWA/NEPA  
C:\Black\FHWA\2003\England\southern corridor deis.wpd

COMMENT  
NUMBER

C-72



May 30, 2003

Robert Dowell, P.E.  
Project Manager  
Utah Department of Transportation  
P.O. Box 700  
Richfield, Utah 84701

Re: Southern Corridor

Dear Mr. Dowell:

I attended the public hearing, held in St. George on April 30, 2003, on the planned Southern Corridor project.

I'm opposed to both the 3400 West and 4300 West alternatives as they have been presented. I'm currently finalizing the purchase of the first phase (600+ acres) and have options on the remaining 1,600+ acres of the Winding River property affected by these two alignments. The alignment and limited access facility being planned will limit access to my proposed development and, in my opinion, will ruin the quality of life of the Outlaw Ridge community currently being planned.

We have final plat approval from Hurricane City on two neighborhoods that would be directly affected by the 3400 West alignment. Our main entrance road at this location is fully designed, engineered and is ready for construction. Further, we are proceeding with the development of the first phase of the project. We expect construction to begin in the very near future.

Sincerely,


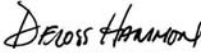


Hank Isaksen  
Outlaw Ridge Development Company, Inc.

cc: Tim Inglis, Winding River Properties, LLC  
Thomas Zinn, Stearns Corporation  
Gene Sturzenegger, Winding River Utah, LC.  
Mayor Tom Hirschi, Hurricane City

PO Box 1026, St. George, Utah 84771  
toll free 800-975-7550 • office 435-674-7400 • fax 435-674-7588  
www.sunrealtyutah.com

C-72.1

	COMMENT NUMBER	COMMENT NUMBER
 <p align="center"><b>ALLIANCE CONSULTING</b> <i>A Planning and Engineering Firm</i></p> <p>July 11, 2003</p> <p>Mr. Gregory S. Punske, P.E. Environmental Program Manager U.S. DOT Federal Highway Administration Utah Division 2520 West 4700 South, Ste. 9A Salt Lake City, UT 84118-1847</p> <p>RE: Southern Corridor Project No. SP-LC53(1)</p> <p>Dear Mr. Punske,</p> <p>Thank you for extending the comment period for the Southern Corridor. This extension has allowed for the formation of a comprehensive Land Use Master Plan developed by a coalition of land owners surrounding the Sand Hollow Reservoir impacted by the alignment.</p> <p>Attached is a Land Use Master Plan, Slope Analysis, and a proposed Southern Corridor alignment for your review. We feel the proposed alignment best serves both the future development and the environmental needs of the project.</p> <p>Thank you again for your consideration. We look forward to meeting with you to discuss our findings in detail.</p> <p>Sincerely,  Deloss S. Hammon, P.E. Principal Engineer</p> <p align="center">2303 North Coral Canyon Blvd., Suite 201, Washington City, Utah 84780-0576 P  435.673.8060 F  435.673.8065</p>	<p align="center"><b>C-73</b></p> <p align="right">-----Original Message----- From: dhercyk@sginet.com [mailto:dhercyk@sginet.com] Sent: Tuesday, July 29, 2003 9:35 PM To: Donegan, Nicole Subject: UDOT Southern Highway Plans</p> <p>Dear Mr. Punske,</p> <p>I urge you to go back to the drawing board with your Draft Environmental Impact Statement (DEIS) on the Southern Corridor. The study is inadequate for several reasons. The three alternatives studied do not provide a reasonable range of alternatives: they are three insignificantly-differentiated versions of the same bad plan. Although the DEIS includes a section on smart growth, this project is tiered to the expectation that Washington County will not use any smart growth planning. In fact, the DEIS acknowledges no impact from public transportation--not even in the year 2030! It's very important to give citizens and policy makers a smart growth alternative that would save water, reduce air pollution, improve quality of life and diminish impacts to plants and wildlife.</p> <p>Although in the DEIS you make an admirable argument for smart growth, this project will in fact promote low-density, leapfrog developments while increasing the value of state lands, and private lands belonging to a cozy group of multi-millionaire land speculators. The DEIS fails to make an adequate connection between the traffic needs generated by your model and the solution you've chosen. By your own admission, the build alternatives would INCREASE traffic congestion on seven of thirty-three segments studied versus the no-build alternative.</p> <p>This project would also have devastating impacts on three endangered plant species. These plants have experienced serious habitat loss through development, drought and habitat degradation from off-road vehicles. This highway could be the death knell for the plants whose numbers are already down seriously before the project.</p> <p>Sincerely, Darrell Hecyk dhercyk@sginet.com</p> <p align="center"><b>C-73.1</b></p>	<p align="center"><b>C-74</b></p>



	COMMENT NUMBER		COMMENT NUMBER
<p><b>Donegan, Nicole</b></p> <hr/> <p><b>From:</b> judithallison@msn.com <b>Sent:</b> Wednesday, September 17, 2003 7:32 PM <b>To:</b> Donegan, Nicole <b>Subject:</b> UDOT Southern Highway Plans</p> <p>Dear Mr. Punske,</p> <p>I urge you to go back to the drawing board with your Draft Environmental Impact Statement (DEIS) on the Southern Corridor. The study is inadequate for several reasons. The three alternatives studied do not provide a reasonable range of alternatives: they are three insignificantly-differentiated versions of the same bad plan. Although the DEIS includes a section on smart growth, this project is tiered to the expectation that Washington County will not use any smart growth planning. In fact, the DEIS acknowledges no impact from public transportation--not even in the year 2030! It's very important to give citizens and policy makers a smart growth alternative that would save water, reduce air pollution, improve quality of life and diminish impacts to plants and wildlife.</p> <p>Although in the DEIS you make an admirable argument for smart growth, this project will in fact promote low-density, leapfrog developments while increasing the value of state lands, and private lands belonging to a cozy group of multi-millionaire land speculators. The DEIS fails to make an adequate connection between the traffic needs generated by your model and the solution you've chosen. By your own admission, the build alternatives would INCREASE traffic congestion on seven of thirty-three segments studied versus the no-build alternative.</p> <p>This project would also have devastating impacts on three endangered plant species. These plants have experienced serious habitat loss through development, drought and habitat degradation from off-road vehicles. This highway could be the death knell for the plants whose numbers are already down seriously before the project.</p> <p>Sincerely, Judith E Allison judithallison@msn.com</p>	C-75	<p><i>This space is intentionally blank.</i></p>	



	COMMENT NUMBER		COMMENT NUMBER
<div>5</div> <div>1       STATEMENT OF <u>MRS. DUBOIS</u>:</div> <div>2       My name is Mrs. Dubois, and I think the project should</div> <div>3 be on the east side of town, not on the west side. I am</div> <div>4 against the 4300 exit because it's very unsafe. You have a</div> <div>5 lot of old people that are retired, and you already have</div> <div>6 people getting killed in that area, and I think it's a very,</div> <div>7 very bad idea.</div> <div>8       I am against 3400 because that's where I live. Before</div> <div>9 I bought my house, I know it had a city park right there off</div> <div>10 9. My view is on a mountain at Quail Lake. Now my property</div> <div>11 is worth nothing. I wouldn't be able to sleep, it would be</div> <div>12 very noisy. I think it is absolutely terrible.</div> <div>13       I think 2800 may be the best in your project, which as</div> <div>14 I said, the east side is much better than the west side.</div> <div>15 Concerning 2800, it is the best of the three because of the</div> <div>16 development of Sand Hollow Reservoir and sand dunes, for the</div> <div>17 recreation areas that have already received a lot of</div> <div>18 advertising.</div> <div>19       STATEMENT OF <u>MR. DUBOIS</u>:</div> <div>20       The intersection of 4300 is rather dangerous right now</div> <div>21 for the gas station and retirement community, and the</div> <div>22 visibility is almost impossible trying to turn. Even a</div> <div>23 right turn is rather dangerous because you just can't see</div> <div>24 the traffic. People really haul on that road right now.</div> <div>25 Taking a left turn, you'd better--if you see--if you've got</div>	<div>T-05.1</div> <div>T-05.2</div> <div>T-05.3</div> <div>T-05.4</div> <div>T-06.1</div>	<div>6</div> <div>1 an open spot, you better put the pedal to the metal and go</div> <div>2 for it. If you hesitate, you're lost. We've seen a number</div> <div>3 of accidents in the year we've lived here.</div> <div>4       STATEMENT OF <u>MRS. THOMAS BLAKE</u>:</div> <div>5       We had to trade our homestead that we own for--because</div> <div>6 it was in the turtle habitat, so we traded for this land</div> <div>7 here. And now they want to put a road through it, and it</div> <div>8 would be through some of our property, and we don't want a</div> <div>9 road through our property. We had to give up some before.</div> <div>10 We don't want to give up this. It's 4300. I think it</div> <div>11 should be one of the other routes, not that one.</div> <div>12       I think that's a very dangerous place to have it come</div> <div>13 out on this intersection, where the service station is</div> <div>14 there, Berry Springs, because there's already been accidents</div> <div>15 there. With all of the traffic that comes out this way, I</div> <div>16 think it's a dangerous place.</div> <div>17       STATEMENT OF <u>BRENT CLOVE</u>:</div> <div>18       My name is Brent Clove. I live at 201 South West</div> <div>19 Diagonal, La Verkin, Utah. Out of the three proposals, not</div> <div>20 too interested in any of the three; however, I guess I'd go</div> <div>21 with the one that's the farthest east, which is the 2800</div> <div>22 West one.</div> <div>23       A concern is just like with the corridor between</div> <div>24 Hurricane and the Washington/Hurricane exit, they're</div> <div>25 planning on putting in stop lights. And the farther west</div>	<div>T-07.1</div> <div>T-08.1</div> <div>T-08.2</div>



	COMMENT NUMBER		COMMENT NUMBER
<p style="text-align: right;">7</p> <p>1 that we put this corridor, the more likelihood that there</p> <p>2 will be a stop light between the corridor--additional stop</p> <p>3 lights between the corridor and Hurricane over the present</p> <p>4 condition. So it would ruin the effectiveness of the</p> <p>5 corridor by having to go through extra stop lights. So I</p> <p>6 would prefer to have the one that's farther east.</p> <p>7 STATEMENT OF <u>BURTON L. SANT</u>:</p> <p>8 I think probably for Hurricane Valley the 2800 would</p> <p>9 probably be the best route. It would cut down congestion on</p> <p>10 SR-9 going toward the freeway. There would also be bleeder</p> <p>11 roads that run into it around the Hurricane airport road,</p> <p>12 700 West, that it would--the other roads would fill back in.</p> <p>13 They're going to be there anyway. There are some existing</p> <p>14 feeder roads along what is Turf Sod Road. Feed back into</p> <p>15 it. That's about it.</p> <p>16 STATEMENT OF <u>DAVID HYATT</u>:</p> <p>17 I think we should just do the least obtrusive thing,</p> <p>18 go down around Sand Hollow, and that way it has less impact</p> <p>19 on the public. That land hasn't been developed yet, and it</p> <p>20 would make sense to go that route. The road is already in</p> <p>21 there past Sand Hollow a little bit, and it would be less</p> <p>22 obtrusive to do that than to try and cut in farther on up.</p> <p>23 STATEMENT OF <u>DESIREE WHITEHEAD</u>:</p> <p>24 I like the 2800 West alternative because it will affect</p> <p>25 the least amount of people at this time and opens up a</p>	<p style="text-align: center;">T-09.1</p> <p style="text-align: center;">T-10.1</p> <p style="text-align: center;">T-11.1</p>	<p style="text-align: right;">8</p> <p>1 greater amount of area for growth. The private property</p> <p>2 that would have to be purchased on the other two</p> <p>3 alternatives would be more expensive and in the long run I</p> <p>4 think would cost more to purchase the property in order to</p> <p>5 run the roads through there. So I prefer the 2800 West</p> <p>6 alternative.</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	

11.4 Transcript from the St. George Public Meeting

	COMMENT NUMBER		COMMENT NUMBER
<div>3</div> <div>1                    <u>PROCEEDINGS</u></div> <div>2                    * * *</div> <div>3</div> <div>4                    STATEMENT OF <u>KENNETH L. ALLISON</u>:</div> <div>5                    My name is Kenneth L. Allison. I'm at 5782 West</div> <div>6                    2500 South, Hurricane, Utah. This is a public comment. I</div> <div>7                    don't represent any organization. I am commenting because I</div> <div>8                    want to express my concerns about the cost of putting this</div> <div>9                    road through.</div> <div>10                   My estimation is that the shortest possible distance</div> <div>11                   requires less maintenance, less installation, less right of</div> <div>12                   way confrontations, less problems with right of way or</div> <div>13                   achieving or acquiring right of way. It requires--the</div> <div>14                   shorter routes require less damage to the Red Cliffs area.</div> <div>15                   There's going--the longer route around Sand Hollow is going</div> <div>16                   to require a lot more blasting to get off that hill.</div> <div>17                   I think the feasible one, probably the less expensive</div> <div>18                   one, is the one in the center, which is--3400 West is</div> <div>19                   probably the most feasible.</div> <div>20                   The road that's on the west side, which is 4300 West,</div> <div>21                   which goes by the existing sewer ponds, would require an</div> <div>22                   overpass because of the traffic conditions there. But my</div> <div>23                   challenge for that argument that that would be the worst is</div> <div>24                   one of these days we're going to have to have an overpass</div> <div>25                   there anyway, because they've put an exit at that point, put</div>	<div>T-12.1</div> <div>T-12.2</div> <div>T-12.3</div>	<div>4</div> <div>1                   an improved road to the public recreation area at Sand</div> <div>2                   Hollow. All the boat ramps are accessible there. They're</div> <div>3                   going to be using 4300 West for that purpose anyway, so</div> <div>4                   they're not going to cut any traffic off by going around the</div> <div>5                   other way.</div> <div>6                   To my estimation, it's going to cost a lot more money</div> <div>7                   to go the long way. I guess that summates it.</div> <div>8                   STATEMENT OF <u>MARY FARRINGTON</u>:</div> <div>9                   I feel the same way.</div> <div>10                   STATEMENT OF <u>LOWELL ELMER</u>:</div> <div>11                   My name is Lowell Elmer. I'm the Director of the Dixie</div> <div>12                   Metropolitan Planning Organization. We're officed in</div> <div>13                   St. George with the Five County Association of Governments.</div> <div>14                   And the MPO is set up to deal with long-range transportation</div> <div>15                   planning and decision making on a regional basis.</div> <div>16                   The MPO is comprised of the Cities of Ivins, Santa</div> <div>17                   Clara, St. George and Washington Cities. We represent those</div> <div>18                   entities in the long-range transportation planning process.</div> <div>19                   The Southern Corridor is one of our high priority</div> <div>20                   projects. As a matter of fact, if I was to rank them, it</div> <div>21                   would be number two in our current priority list for the</div> <div>22                   Dixie MPO area. And so we'd like to see it constructed as</div> <div>23                   soon as possible.</div> <div>24                   And we recognize that the first leg between Atkinville</div> <div>25                   Interchange and the area near the St. George relocation, the</div>	<div>T-13.1</div> <div>T-14.1</div> <div>T-14.2</div>

	COMMENT NUMBER	COMMENT NUMBER
<div style="text-align: center;">5</div> <div> <p>airport would be--the section from there over to the location of the proposed St. George replacement airport would be our first priority for the Southern Corridor, which is right now our second priority of all of our needs that we have in the area.</p> <p>We think that's important, because that particular area of Dixie is where most of the growth is going to occur, not just the airport but a lot of the development and growth, commercial and residential. It's one of the few places left for growth to go. And the area is growing about five and a half percent per year. We see that continuing for some time. It may taper off a little bit.</p> <p>The Southern Corridor is an important link in the belt loop that we would like to see constructed here to help relieve traffic on our existing arterials and collector roads in the Dixie area. That's my statement.</p> <p>STATEMENT OF MELVIN L. LLOYD:</p> <p>My comment is if they're gonna build this road, they need to make sure that they fund the maintenance for it so that the people that are having to do that maintenance right now aren't overburdened more than they are. That's it.</p> </div>	<div>T-14.3</div> <div>T-15.1</div>	<div>This area is intentionally blank.</div>



## 11.5 Responses to Comments

**Table 11.5-1. Responses to Comments**

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Ron McCollum	C-01.1	Purpose and Need	1.8	<p>Comment – This is a road that goes essentially nowhere and won't for the next 10 or 15 years. It will not relieve traffic congestion on SR 9 and will not assist in relieving traffic going to or from St. George. The only reason for the road is to help developers sell property.</p> <p>Response – The need for the road is discussed in Chapter 1, Purpose of and Need for Action. The purpose of the road is to provide a regional transportation facility between St. George, Washington City, and Hurricane that would complement local land use plans. The corridor would also accommodate areas of future growth, reduce some traffic on the existing and future network of arterial and city streets, and improve conditions in areas already developed.</p>
	C-01.2	Purpose and Need	1.8	<p>Comment – We need another access to St. George that will help alleviate traffic on SR 9 and help remove the constant traffic on St. George Blvd. for people accessing I-15.</p> <p>Response – Comment noted. See response to comment C-01.1.</p>
	C-01.3	Purpose and Need	1.8	<p>Comment – Until the “new airport” exists, there is no reason for this road and even then, unless you are traveling from the “proposed” housing projects to the “proposed” airport, the route has no value.</p> <p>Response – See response to comment C-01.1. The road will provide access to the proposed St. George replacement airport.</p>
(No name provided)	C-02.1	Purpose and Need	1.8	<p>Comment – I could care less. I just want to sell my house so I can move to Colorado where the summers are not so terribly hot.</p> <p>Response – Comment noted.</p>
Deana Mills	C-03.1	Alternatives	2.2	<p>Comment – I prefer the 2800 West Alternative.</p> <p>Response – Comment noted.</p>
	C-03.2	Farmland	4.2	<p>Comment – Most of the area is farmland waiting to be developed.</p> <p>Response – Comment noted. The 4300 West Alternative would impact 1 acre, the 3400 West Alternative would impact 50 acres, and the 2800 West Alternative would not impact any prime, unique, or state-important farmland. The cumulative impact analysis notes that much of the farmland within the city limits will be developed.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
(No name provided)	C-04.1	Alternatives	2.2	<p>Comment – The 2800 West Alternative would be the best choice. The alternative would serve both the lake and recreationalist.</p> <p>Response – Comment noted.</p>
Junius Campbell	C-05.1	Purpose and Need	1.8	<p>Comment – We don't need the Southern Corridor. SR 59 needs improvement to make the road more safe.</p> <p>Response – The need for the road is discussed in Chapter 1, Purpose of and Need for Action. The Southern Corridor is needed to enhance the current and future transportation network, address the lack of future capacity in the southern limits of the local cities to meet travel demand, and help accommodate the future growth expected in the area by 2030. SR 59 is outside the Southern Corridor study area.</p>
Mary Bray	C-06.1	Land Use	4.1	<p>Comment – I support trading BLM land versus buying from private landowners.</p> <p>Response – The Southern Corridor would use both public and private land. Given the length and purpose of the project, it would be impossible to take only public land.</p>
	C-06.2	Alternatives	2.2	<p>Comment – I support the 2800 West Alternative because it will create less environmental impacts and it will support the Sand Hollow Reservoir. It may also bring in more tourist dollars to the area.</p> <p>Response – Comment noted.</p>
	C-06.3	Environmental Consequences	4.0	<p>Comment – What wildlife will be impacted? We have some unique plants that need to be preserved and archaeological sites should be protected. Who would provide road maintenance for the Southern Corridor?</p> <p>Response – Potential impacts to threatened and endangered species are addressed in Section 4.14 and impacts to archaeological sites in Section 4.15. Some of these resources would be impacted by the project. Road maintenance would depend on whether the project is a local or state road. If the project is a local road, maintenance would be provided by Washington County or the local cities. No decision has been made if the Southern Corridor would be a state or local road.</p>
	C-06.4	Smart Growth	6.0	<p>Comment – This seems to be a rapidly growing area and the road system and organization are not keeping up with the growth. Having lived here for five years, I would like to see the area remain smaller and less impact on the environment, but progress is happening.</p> <p>Response – See Chapter 6, Smart Growth. The local cities could implement planning initiatives that could maintain the natural environment, reduce the need for future roads and vehicle miles traveled, and minimize environmental impacts.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Roy Bray	C-07.1	Alternatives	2.2	<p>Comment – I prefer the 2800 West Alternative because it offers access further east and is less intrusive on the environment. I don't care about the effect on developments—they can provide their own roads.</p> <p>Response – Comment noted.</p>
	C-07.2	Alternatives	2.2	<p>Comment – Whichever route is selected, move quickly to get all the right-of-way before the cost of land goes up. Can you trade some land elsewhere to get land along the 2800 West Alternative?</p> <p>Response – Once a decision on the selected corridor is made in the Record of Decision, it will be up to the local cities to preserve the right-of-way needed for the highway. How land is acquired for the project will depend on many factors including costs, impacts to existing residents, and fair market value for the property. Once a decision is made to purchase property, the type of purchase or land transfer would be negotiated with the property owner.</p>
David Isom	C-08.1	Alternatives	2.2	<p>Comment – I prefer the 2800 West Alternative. Residents from the proposed Dixie Springs and Outlaw Ridge developments will use SR 9. Residents from the Sky Ranch area will all go into Hurricane and then to St. George, which will cause congestion.</p> <p>Response – Comment noted.</p>
John Donnell	C-09.1	Alternatives	2.2	<p>Comment – I have no financial interest in the proposed Outlaw Ridge development but I think it is better to avoid the property. Although there is a safety issue with the 4300 West Alternative, I prefer that option.</p> <p>Response – Comment noted.</p>
(No name provided)	C-10.1	Alternatives	2.2	<p>Comment – I prefer the 4300 West Alternative because it provides the most direct route.</p> <p>Response – Comment noted.</p>
James L. Dykmann – Deputy State Historic Preservation Officer (Archaeology)	C-11.1	Historic, Archaeological, and Paleontological	3.15, 4.15	<p>Comment – The State Historic Preservation Office offers no technical comments for the Draft EIS. The understanding and analysis of historic and archaeological property are appropriate and should be useful in understanding the undertaking's potential to affect cultural resources.</p> <p>Response – Comment noted.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Leigh J. Kuwanwisiwma – Director, Hopi Cultural Preservation Office	C-12.1	Historic, Archaeological, and Paleontological	3.15, 4.15	<p>Comment – The EIS has an area of controversy and major unresolved issues. BLM Instructional Memoranda 98-131-2 prohibit reburial of human remains and associated objects subject to the Native American Graves Protection and Repatriation Act originating or excavated from BLM-administered land on BLM land. Therefore, we oppose the data recovery proposed on BLM land under current BLM procedures. The Hopi Cultural Preservation Office requests consultation with FHWA, UDOT, and BLM to discuss the proposed draft Memorandum of Agreement and repatriation and disposition of human remains and associated objects culturally affiliated to the Hopi Tribe that may be discovered as a result of this project.</p> <p>Response – To address these concerns, FHWA and BLM met with the Hopi Tribe on February 24, 2003. As a result of this meeting, FHWA and BLM have committed to continue to coordinate with the Hopi Tribe and other Native American groups that have expressed interest in this project. See Section 4.15.1, Cultural Resources. In addition, FHWA and UDOT will continue to work with interested Native Americans in developing a plan for dealing with discoveries during construction and acceptable treatment of the discoveries agreeable to all parties. The plan will be finalized prior to construction.</p>
R.G. Smith	C-13.1	Purpose and Need	1.8	<p>Comment – I suggest a new four-lane highway from I-15 at milepost 2 to go east, then northeast to Hurricane at about 3800 West; build a new bridge over the Virgin River, and connect to a new interchange on I-15 between Leeds and Silver Reef.</p> <p>Response – The need for the road is discussed in Chapter 1, Purpose of and Need for Action. The purpose of the road is to provide a regional transportation facility between St. George, Washington City, and Hurricane that would complement local land use plans. The corridor would also accommodate areas of future growth, reduce some traffic on the existing and future network of arterial and city streets, and improve conditions in areas already developed. A road north of SR 9 to I-15 would not meet the project's purpose and need and therefore was not analyzed in the EIS. A connection to SR 9 at 3800 West would conflict with the land use plans of Hurricane and would bisect planned developments.</p>
	C-13.2	Purpose and Need	1.8	<p>Comment – Make another four-lane road north of SR 9 through Hurricane and widen I-15 from milepost 27 through Toquerville to La Verkin.</p> <p>Response – See response to comment C-13.1.</p>
	C-13.3	Purpose and Need	1.8	<p>Comment – Southern Utah is growing to be a big city. We need many roads.</p> <p>Response – Comment noted.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Charles Reeve	C-14.1	Alternatives	2.2	<p>Comment – I prefer the 2800 West connection because this route would likely connect to the Sand Hollow Reservoir construction haul road and could divert some traffic from SR 9. Trying to get onto SR 9 eastbound at 2260 West is like taking your life in your hands. There is too much traffic on SR 9!</p> <p>Response – Comment noted.</p>
	C-14.2	Purpose and Need	1.8	<p>Comment – I support anything that would make it easier to get from 331 N. 2260 W. into Hurricane—completing 600 N. from 2260 W. to 200 W. would help.</p> <p>Response – Comment noted.</p>
	C-14.3	Purpose and Need	1.8	<p>Comment – I am disappointed that the option of following the Utah-Arizona border up the Honeymoon Trail and connecting in near Colorado City is no longer being considered.</p> <p>Response – The project mentioned was part of the Transamerica Transportation Corridor that was studied in 1996 (see Section 1.1.2). In October 1996, the Grand Staircase Escalante National Monument was designated, restricting resource development. The likelihood of coal-carrying trucks traveling through Hurricane was reduced, lessening the immediate need for a bypass route directly from SR 59 to I-15.</p>
	C-14.4	Purpose and Need	1.8	<p>Comment – None of the current options offer any real advantage over the current I-15 to SR 9 route for an east-west traveler.</p> <p>Response – Comment noted. The alternatives are not intended to provide an advantage over the current I-15 to SR 9 route. The purpose of the Southern Corridor is to provide a regional transportation facility between St. George, Washington City, and Hurricane that would complement local land use plans. The corridor would also accommodate areas of future growth, reduce some traffic on the existing and future network of arterial and city streets, and improve conditions in areas already developed.</p>
	C-14.5	Purpose and Need	1.8	<p>Comment – The current three options look like they are intended to help the State Street businesses in Hurricane, but offer no advantages to the traveler.</p> <p>Response – See response to comment C-14.4.</p>
Lavoid Leavitt	C-15.1	Alternatives	2.2	<p>Comment – All choices were great.</p> <p>Response – Comment noted.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Ray Rosenthal – Colliers International Real Estate	C-16.1	Alternatives	2.2	<p>Comment – The key items I support are getting the Atkinville interchange built and the initial portion of the Southern Corridor completed to River Road, which will allow for quick access to the Fort Pearce Industrial Park. Then, as soon as the replacement airport is built, the Southern Corridor could be extended to provide access to the airport.</p> <p>Response – Comment noted.</p>
	C-16.2	Alternatives	2.2	<p>Comment – I support the 3400 West Alternative because it appears to be the best alternative and is also the least expensive.</p> <p>Response – Comment noted.</p>
	C-16.3	Economic	4.5	<p>Comment – Providing quick and quality access to the Fort Pearce Industrial Park is the most likely way to increase Washington City's job growth and tax base, which will benefit all of the county and help pay for the cost of the Southern Corridor and the new airport.</p> <p>Response – Comment noted.</p>
Don Musich – Skyridge Homes	C-17.1	Alternatives	2.2	<p>Comment – I support the 4300 West Alternative because it is the shortest route and would accomplish the alternate route to the airport and the Arizona border. I support the 3400 West Alternative as my second choice. However, it would be harder to deal with the Outlaw Ridge development.</p> <p>Response – Comment noted.</p>
Carol Musich	C-18.1	Alternatives	2.2	<p>Comment – I support the shortest route (4300 West Alternative).</p> <p>Response – Comment noted.</p>
Douglas Klein	C-19.1	Alternatives	2.2	<p>Comment – In reference to that portion of the Southern Corridor on the 1/4 section line through section 24 up to section 13 and more specifically that portion of the Southern Corridor on the 1/4 line that is located close to where the 1/4 line intersects section 24 and section 13, I would prefer to see the radius...the curve...the turn in the Southern Corridor placed closer to and preferably right over that point of intersection [would like to see the Southern Corridor alignment adjusted to follow the Klein property line rather than bisect my property].</p> <p>Response – The preferred alignment on the Klein property in the vicinity of section 24 was originally developed in coordination with the property owners. The alignment will be adjusted as requested in the comment.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-19.2	Alternatives	2.2	<p>Comment – I am also interested in the frontage road considerations along the Southern Corridor that will provide access to adjoining property. How is that handled? Is it handled within the existing proposed corridor?</p> <p>Response – A frontage road system is not part of the Southern Corridor project. Any frontage or access roads to property would be the responsibility of the local cities and Washington County.</p>
Royden Wittwer	C-20.1	Alternatives	2.2	<p>Comment – I prefer the 3400 West Alternative because it has better visibility for the off ramp and less construction cost than the 2800 West Alternative. With the turn in the road at 4300 West, [that alternative] may be dangerous.</p> <p>Response – Comment noted.</p>
	C-20.2	Economic	4.5	<p>Comment – I am concerned about signing. No signs (private or state) should be posted to direct traffic to Zion National Park from the south or to Mesquite, Nevada, from the east, effectively bypassing St. George and Washington City. This could have an adverse effect on local businesses.</p> <p>Response – Potential bypass impacts are analyzed in Section 4.5, Economic Impacts. Results of the analysis determined that potential economic impacts to St. George and Washington City would be small.</p>
David J. Demas – City of St. George	C-21.1	Alternatives	2.2	<p>Comment – I support the 3400 West Alternative because it is a better location for the intersection at SR 9. Access on and off SR 9 is a big issue. This location provides the best horizontal sight distance.</p> <p>Response – Comment noted.</p>
	C-21.2	Alternatives	2.2	<p>Comment – The project is necessary. Many routes have been studied and these seem to be the most feasible. I do not support the 2800 West Alternative, as I don't want the road to go around the Sand Hollow Reservoir site. This may cut off future recreational opportunities. The project should move forward as soon as possible and no later than the airport construction.</p> <p>Response – Potential impacts to recreation areas are addressed in Section 4.3.8, Recreational Resources. Although the 2800 West Alternative could limit access between the Sand Hollow Reservoir and the Sand Mountain Recreation Area, UDOT would work with State Parks and BLM to ensure that the appropriate overpasses or underpasses are provided to allow access to recreation areas.</p> <p>The first phase of the Southern Corridor would likely include the connection from I-15 to the proposed St. George replacement airport.</p>
James Blanchmore – La Verkin City Board of Adjustments	C-22.1	Environmental Consequences	4.0	<p>Comment – It seems that it [2800 West Alternative?] is less intrusive to wildlife and farms.</p> <p>Response – Comment noted.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Howard Bardwell	C-22.2	Alternatives	2.2	<p>Comment – I like the 2800 West Alternative. (1) It comes out closer to downtown Hurricane businesses. (2) It is far safer than the other alternatives. (3) It is scenic along the Sand Hollow Reservoir. (4) It is less destructive to existing houses and farms such as Flora Tech and the pecan orchard.</p> <p>Response – Comment noted.</p>
	C-22.3	Purpose and Need	1.8	<p>Comment – I have long thought it would be nice to have an alternative road to the west. I also think that there should be a way for people from the east to circumvent the narrow streets of Hurricane. Somehow all of these roads should be able to bypass the restrictions of the towns and slow traffic to safely flow around the downtown areas.</p> <p>Response – Comment noted. A road east of Hurricane is outside the study area and would not meet the project's purpose and need of providing a regional facility between St. George, Washington City, and Hurricane.</p>
	C-23.1	Alternatives	2.1	<p>Comment – I prefer the 4300 West Alternative because it is the shortest and most direct route and also is one of the lower-cost alternatives. The 3400 West Alternative has no benefit because the Outlaw Ridge will provide for its own traffic requirements. The 2800 West route runs through the Sand Hollow area, adding more traffic with little benefit.</p> <p>Response – Comment noted.</p>
	C-23.2	Environmental Consequences	4.0	<p>Comment – The area involved in the three alternatives is already developed to the extent that [environmental and cultural] considerations are of little importance.</p> <p>Response – Comment noted. Potential impacts to the natural and human environment are analyzed in Chapter 4, Environmental Consequences.</p>
Larry Bulloch – City of St. George	C-23.3	Purpose and Need	1.8	<p>Comment – The traffic congestion through the old downtown Hurricane on SR 9 from 300 W. to the La Verkin bridge is serious and requires some relief. An alternative route from the west side of Hurricane to SR 59 east of town would be a much-needed alternative.</p> <p>Response – See response to comment C-22.3.</p>
	C-24.1	Purpose and Need	1.1	<p>Comment – MPO designation has taken place as well as committee reorganization.</p> <p>Response – The Final EIS has been updated regarding the MPO.</p>
	C-24.2	Purpose and Need	1.2	<p>Comment – Transit service is now provided by St. George and the transit plan is being developed, hopefully complete by the end of the summer.</p> <p>Response – The Final EIS has been revised regarding the latest transit information.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-24.3	Purpose and Need	1.2	<p>Comment – Bus service has changed.</p> <p>Response – The Final EIS has been revised regarding the latest bus service information.</p>
	C-24.4	Alternatives	2.2	<p>Comment – St. George No-Build improvements need to be updated.</p> <p>Response – The Final EIS has been revised to include the latest information regarding No-Build projects.</p>
Jacqueline Dubois	C-25.1	Alternatives	2.2	<p>Comment – No to the 3400 West Alternative. It will bring noise, pollution, and accidents near my home.</p> <p>Response – Comment noted.</p>
Jack M. Farnsworth	C-26.1	Alternatives	2.2	<p>Comment – I support the 2800 West Alternative. The elements I support for my reasoning are principally the advantages and disadvantages of the alternative route. I think they outweigh both of the others with the exception to the cost, but I believe even that will be an advantage in the future building a bypass route from the southeast corner of Sand Hollow Reservoir to the Colorado City Highway going to Arizona. The other two routes would cause additional congested areas on SR 9, which is one of the few traffic releases off I-15.</p> <p>Response – Comment noted.</p>
	C-26.2	Purpose and Need	1.8	<p>Comment – UDOT should look at more available outlets from St. George to I-15.</p> <p>Response – The project's purpose and need does not involve improvements to I-15. See response to comment C-01.1.</p> <p>Comment – UDOT should look at a road from Sunset Blvd. in St. George to I-15 through the mountains and coming out close to Zions turn off on SR 9.</p> <p>Response – See response to comment C-26.2.</p>
	C-26.3	Alternatives	2.2	<p>Comment – I do not support the 3400 West alternative.</p> <p>Response – Comment noted.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Jay Beacham	C-27.1	Land Use	4.1	<p>Comment – I am opposed to the construction of the proposed Southern Corridor because whenever a highway is made through a pristine area, developments of houses soon line both sides of that road. Several developments have already been constructed or soon will be at points along that route. This is a lovely and scenic area of natural beauty which is being destroyed by unregulated development expansions. Roads open up that expansion. Please don't let this road be constructed.</p> <p>Response – See Section 4.1, Land Use Impacts. Discussion with local city planners determined that the growth would occur with or without the Southern Corridor. Population in the study area is expected to grow from about 65,000 to over 200,000 by 2030. Because of the limited opportunities for growth to the north as a result of the Red Cliffs Desert Reserve, it is anticipated that growth will occur south of St. George and Washington City. If the Southern Corridor were not built, the cities would construct arterial roads to support the development in that area as described in Section 4.1.1.1, No-Build Alternative. The Southern Corridor would provide a more efficient transportation system to support the anticipated growth.</p>
Sheldon Green	C-28.1	Alternatives	2.2	<p>Comment – I prefer the 4300 West Alternative. There is already a road plan there to Sand Hollow Reservoir.</p> <p>Response – Comment noted.</p>
	C-28.2	Alternatives	2.2	<p>Comment – I think UDOT should consider a traffic light at SR 9 and Quail Lake Estates by the Chevron station.</p> <p>Response – Comment noted. If the 4300 West Alternative is selected, this intersection would be improved to an interchange.</p>
	C-28.3	Alternatives	2.2	<p>Comment – No to the 3400 West Alternative. It has the greatest number of relocations and it conflicts with the Outlaw Ridge development.</p> <p>Response – Comment noted.</p>
Jay and Bonnie Mainteer	C-29.1	Purpose and Need	1.8	<p>Comment – I support the Southern Corridor project because it is needed for the growth.</p> <p>Response – Comment noted.</p>
	C-29.2	Alternatives	2.2	<p>Comment – I prefer the 4300 West Alternative because of the distance and impacts.</p> <p>Response – Comment noted.</p>
	C-29.3	Alternatives	2.2	<p>Comment – No to the 3400 West Alternative.</p> <p>Response – Comment noted.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Tom Hirschi – Mayor, City of Hurricane	C-30.1	Alternatives	2.2	<p>Comment – The City of Hurricane has chosen to support the 2800 West Alternative through the city for the following reasons: 1) fewer property owners involved; 2) improved access to recreation sites and projected future development; 3) better opportunities for east-west connections from the city; 4) best location for connection to SR 9 because of safer access and proximity to the main part of the city; 5) lowest number of cultural sites.</p> <p>Response – Comment noted.</p>
	C-30.2	Alternatives	2.2	<p>Comment – We recommend that the connection between SR 9 and the Southern Corridor be with overpasses for a smooth transition of traffic.</p> <p>Response – The travel volumes were considered in developing the design for each of the three alternatives at the SR-9 connection. The projected traffic volumes for 2030 do not show a need for a full grade separated interchange at SR-9. An interchange was developed for the 4300 West Alternative because of sight distance and other safety concerns. The 2800 West and the 3400 West alternatives do not have similar safety concerns. This EIS will not preclude an interchange on SR-9 if there is a purpose and need established in the future.</p>
Tom Shelly	C-31.1	Purpose and Need	1.8	<p>Comment – I do not support any of the alternatives. Let's pay for what we've got going on now first before beginning a new project.</p> <p>Response – Comment noted.</p>
	C-31.2	Alternatives	2.2	<p>Comment – No! to the 3400 West Alternative.</p> <p>Response – Comment noted.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Jim Steitz	C-32.1	Purpose and Need	1.8	<p>Comment – This project is bound to unleash a wave of low-density development, negating much of the traffic congestion purpose for the project itself. This project will induce such poorly planned development that the long-term capacity issue in the area may be made worse through induced demand. Indeed, the FHWA admits that each of the action alternatives would actually increase traffic congestion on 7 of 33 segments studied versus the No-Build Alternative. This calls into question the true purpose of the document.</p> <p>Response – See Section 1.8, Conclusion, in Chapter 1, Purpose of and Need for Action. The primary purpose of the Southern Corridor is to provide a regional transportation facility between St. George, Washington City, and Hurricane that would complement local land use plans, not to negate traffic congestion. However, part of the secondary purpose of the project is to reduce <i>some</i> traffic on the existing and future network of arterial and city streets and improve conditions in areas already developed. As you have noted, the Southern Corridor would decrease traffic congestion in 26 of the 33 segments, therefore reducing some traffic on the existing network. The roadways where traffic would increase are I-15 and SR 9 at the interchange with the Southern Corridor.</p> <p>Table 2.1-3, Build versus No-Build VMT, VHT, and Average Speed (Capacity Constrained), shows the increase in VMT between the No-Build and build alternatives. Although the VMT would increase by an average of 11.1%, the amount of time traveling would decrease by 7.7%. Additionally, discussion with city planners indicated that the ultimate growth patterns and planned land uses would be similar with or without the Southern Corridor because of the limited growth potential north of the study area. Finally, FHWA, UDOT, and EPA have been working with the local communities to implement smart growth (see Chapter 6, Smart Growth). This has resulted in the City of St. George implementing initiatives to minimize urban sprawl and environmental impacts.</p>
	C-32.2	Threatened and Endangered Species	4.14	<p>Comment – This project would destroy populations of Holmgren milkvetch, dwarf bearclaw poppy, and Siler's pincushion cactus. The federal government's project cannot simply violate the Endangered Species Act. The dwarf bearclaw poppy may be Utah's most endangered plant.</p> <p>Response – Section 4.14 details the impacts to threatened and endangered species, including potential impacts to Holmgren milkvetch and dwarf bearclaw poppy. Siler's cactus was not located along the Southern Corridor alignments. FHWA has complied with the Endangered Species Act and has received a Biological Opinion from USFWS. The Biological Opinion stated the proposed Southern Corridor was likely to adversely affect the Holmgren milkvetch, bearclaw poppy, and Siler cactus but is not likely to jeopardize the continued existence provided that active conservation measures are implemented. Mitigation for these species was developed in consultation with USFWS.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-32.3	Alternatives	2.0	<p>Comment – The FHWA is proposing three equally bad alternatives. The projects have been reduced to three different road designs, rather than being truly different alternatives for meeting the purpose and need. The DEIS is connected to the assumption that Washington County will not use any smart growth planning and assumes no impact from public transportation for the entirety of the project planning horizon.</p> <p>Response – The EIS has evaluated a reasonable number of alternatives within the reasonable range of alternatives. Chapter 2, Alternatives, details the alternatives evaluated. These alternatives included both highway and non-highway alternatives. Mass transit was included in this analysis and it was determined that the current or future population base of the area could not support a rail transit system. Potential bus service was also reviewed and, although it will continue to be an important part of the region's development, it could not meet the main purpose of providing a regional transportation facility between St. George, Washington City, and Hurricane.</p> <p>Certainly, a full range of alternatives must be examined under NEPA. However, not every alternative must be analyzed. NEPA requires only that the EIS be sufficiently inclusive and informative in its description and discussion of alternatives to allow the decision-making agency to make an informed choice to proceed with the project or not.</p> <p>An agency must consider only those alternatives that are reasonable under the circumstances that are expected to exist. A reasonable alternative is one that will meet the purposes of the project—in other words, if an alternative will not meet the purposes of the project, it is not reasonable. The definition of a reasonable alternative also includes the requirement that an alternative be able to meet a project's purpose and need in a timely manner.</p> <p>As described above, the EIS has evaluated a reasonable number of alternatives within the range of reasonable alternatives. Because land use changes could not meet the purpose and need of providing a regional facility between the local cities, it is not considered a reasonable alternative. According to the state constitution, regional planning is a local responsibility. NEPA does not require examination of unrealistic or highly hypothetical alternatives, nor does it permit federal decision-makers to ignore local planning processes.</p> <p>As discussed in Chapter 6, Smart Growth, the FHWA, UDOT, and EPA worked with the local cities regarding smart growth opportunities. As a result of this process, St. George has implemented many smart growth initiatives and has revised its land use plan.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-32.4	Alternatives	2.0	<p>Comment – The direct causality between the actions of FHWA and the land-use situation in the area is the crucial link that FHWA cannot avoid and which has the effect of nullifying the project's purpose and need. NEPA is clear that government agencies cannot avoid a comprehensive look at broad alternatives simply by the nature of the agency's area of purview. In other words, NEPA obliges the FHWA to take a much broader look at possible alternative land-use and planning futures of the area.</p> <p>Response – See response to comment C-32.3.</p>
Deloss S. Hammon – Alliance Consulting	C-33.1	Alternatives	2.0	<p>Comment – SITLA, WCWCD, and Dave Wilkie, who is representing several private landowners, have formed a coalition to complete certain aspects of land planning in the Southern Corridor area. All of these owners will be significantly impacted by this project.</p> <p>Response – Comment noted. The Southern Corridor alternatives were developed considering the natural environment and to accommodate future growth. Development plans at the time of the alternative development process were considered.</p>
Vyonne S. Mendenhall – A.R. Spilsbury Family Enterprises	C-34.1	Alternatives	2.0	<p>Comment – The 2800 West route runs through approximately 3 miles of our property. If this route is chosen, we would require an interchange at least every mile, sound walls, and landscape enhancements.</p> <p>Response – Comment noted. The Southern Corridor would be initially constructed as a limited-access facility with at-grade intersections and, when traffic warrants, upgraded to a facility with interchanges. The exact location of interchanges would be based on future development and must be justified based on traffic demand. Because there is little development along the proposed alternatives, sound wall locations have not been included as part of the project. In addition, under UDOT policy, sound walls are approved for existing developed areas only. After construction, the disturbed areas along the highway will be replanted with native plants.</p>
John D. and Constance J. Clemens	C-35.1	Smart Growth	6.0	<p>Comment – We suggest that there are current demands for more water than what is available. The proposed project will encourage accelerated commercial, industrial, and residential growth. The current residents would be subjected to increased restrictions on water quantity and increased cost.</p> <p>Response – Growth in the area will occur with or without the Southern Corridor; therefore, water demand is the responsibility of the local governments and the WCWCD. Chapter 6, Smart Growth, addresses future water demand, potential water shortfalls, and the need to implement water conservation measures.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-35.2	Purpose and Need, Smart Growth	1.8, 6.0	<p>Comment – A highway that may produce commute-time savings of 8% should be ruled out on that statistic alone. Taxpayers should not be asked to give up thousands of acres of open land in exchange for the expenditure of a quarter of a billion dollars and more poorly planned, low-density sprawl.</p> <p>Response – The Southern Corridor project was brought forward as a proposal by the local communities. The communities felt that the project is needed to provide a regional transportation facility between the cities that would also complement local land use plans. The communities brought the project forward knowing the required expenditures.</p> <p>FHWA, EPA, and UDOT have been working with the local communities to address both local and regional planning and ways of implementing smart growth. Chapter 6, Smart Growth, details some of the planning steps taken to address low-density development with the local communities.</p>
	C-35.3	Threatened and Endangered Species	4.14	<p>Comment – The cursory attention given to the destruction of the dwarf bearclaw poppy does not meet the requirements of the Endangered Species Act.</p> <p>Response – See response to comment C-32.2.</p>
	C-35.4	Alternatives	2.2	<p>Comment – The DEIS purports to present four alternatives, but the reality is that there are two—build or no-build. The commonality of nearly all the lengths of the three build alternatives makes it farcical to present them as significantly different.</p> <p>Response – See response to comment C-32.3.</p>
	C-35.5	Purpose and Need	1.8	<p>Comment – The Southern Corridor is designed to benefit a few while working to the overall detriment of the many and should be abandoned.</p> <p>Response – See response to comment C-35.2.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Joel M. Peterson and Elaine York – The Nature Conservancy of Utah	C-36.1	Threatened and Endangered Species	4.14	<p><i>Note: On July 9, 2003, The Nature Conservancy of Utah submitted a revised version of their original comments from May 30, 2003. This FEIS includes only the revised version of their comments.</i></p> <p>Comment – We disagree with USFWS's biological opinion and believe that any loss of habitat jeopardizes the existence of the bearclaw poppy, Holmgren milkvetch, and Siler cactus for the following reasons:</p> <ul style="list-style-type: none"> <li>• The size and distribution of existing populations are already alarmingly small.</li> <li>• All existing populations are critical to provide genetic diversity necessary to adapt to existing and future environmental conditions.</li> <li>• Loss of habitat means not only a loss of the existing plants, but also the loss of the seed bank.</li> <li>• Anything that further reduces the genetic diversity of these three plant species would impact the rare plant populations.</li> <li>• Plant numbers alone is not a safe criterion for an evaluation of reproductive health of the poppy. Population density strongly influences the poppy's reproductive success.</li> <li>• Bearclaw poppy habitat loss will continue as a result of urban growth, increased use of OHVs, and other recreation. Every attempt should be made to prevent further habitat loss.</li> </ul> <p>Response – See response to comment C-32.2 regarding the USFWS Biological Opinion. The analysis in the EIS notes the potential impacts to genetic diversity and the concerns with the long-term reproductive success of the endangered plant species. Additionally, the cumulative impact analysis includes a discussion of the effects from continued urban growth and concludes that the overall continued loss of habitat on state and private land could threaten the existence of the endangered plants. In 2004, FHWA reinitiated the Section 7 process to account for new information on the bearclaw poppy and Holmgren milkvetch obtained since 2002. Based on the re-evaluation, USFWS concurred with the findings that the Southern Corridor was likely to adversely affect the bearclaw poppy and Holmgren milkvetch.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-36.2	Threatened and Endangered Species	4.14	<p>Comment – Plant habitat for these three species needs to be redefined. We suggest that the numerous plant surveys that have been conducted for the past 15 years be consulted to define habitat for each of these three species. The last few years have been drought years resulting in few visible plants.</p> <p>Response – The endangered species plant habitat was gathered from surveys conducted for the project, past plant surveys, and from BLM. The surveys conducted for the Southern Corridor included both individual plants and actual habitat based on soil type. Because of the drought conditions during the time of the Southern Corridor surveys, mitigation was added to the EIS for new surveys to be conducted before construction. These additional surveys will be coordinated with USFWS. In addition, FHWA reinitiated the Section 7 process for this project based on the surveys conducted for the Holmgren milkvetch and bearclaw poppy that occurred after the issuance of the USFWS biological opinion in September 2002.</p>
	C-36.3	Threatened and Endangered Species	4.14	<p>Comment – The biological assessment for the Southern Corridor was not available in the Draft EIS. When was this survey completed? Is this document available for comment?</p> <p>Response – Because reports such as the biological assessment and survey data give the locations of sensitive species, they are typically not made available in public reports such as an EIS or made available to the public. FHWA in consultation with USFWS will review any request to review such reports to ensure the proper use of such information.</p>
	C-36.4	Threatened and Endangered Species	4.14	<p>Comment – Habitat for these rare plants is not mitigable. All existing habitat is critical to the survival of these three plant species. One acre of habitat would be protected when one acre is destroyed is still a net loss of habitat when so little remains. To date, no bearclaw poppies have been successfully transplanted or germinated. <i>In situ</i> conservation [at the plants' original location] is critical for the poppy.</p> <p>Response – The mitigation measures have been revised based on consultation with USFWS and now are 3-for-1 for direct impacts and 5-for-1 for indirect impacts to habitat for mitigation that occurs in the primary affects zone. This conservation would result in a net loss of habitat within the Southern Corridor right-of-way but would protect areas currently being threatened by recreational use or future development on state or private land. The mitigation does not include transplanting species for the reasons stated in the comment. The general locations of the conservation parcels are identified in the USFWS Amended Biological Opinion (Appendix C). These general locations were selected based on the location near the plants' habitat that would be affected by the Southern Corridor in order to maintain the species diversity.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-36.5	Threatened and Endangered Species	4.14	<p>Comment – There is reasonable doubt that mitigation measures will be taken. There are no guarantees of fences being built or maintained. The Red Bluff bearclaw poppy population has been fenced, but bicycles are allowed in the area and considerable habitat has been damaged. The Warner Ridge ACEC has never been fenced. White Dome, important habitat for the poppy and Siler cactus, is SITLA land and could be sold.</p> <p>Response – If the proposed Southern Corridor is built, all mitigation identified in the EIS and the Biological Opinion will be implemented. The intent of installing fences is to keep the plants from being harmed by unauthorized use of an area. The areas identified for conservation in the EIS would not allow motorized or bicycle access that could potentially harm the habitat.</p>
	C-36.6	Threatened and Endangered Species	4.14	<p>Comment – Reassess all development plans for the area. The Draft EIS addresses adverse effects of the Southern Corridor on these plant species. However, there are many other development plans for this area, which will also affect these three rare plants and increase the overall impact of any habitat loss. We suggest that you coordinate your Southern Corridor planning with Washington County planning to accurately assess adverse effects on the existing rare plant populations.</p> <p>Response – Section 4.14.3, Cumulative Impacts, does analyze the potential cumulative impacts of future development in the region along with the Southern Corridor. For this analysis, it was assumed that all remaining sensitive plant habitat on private and state land would be developed. The conclusion of the EIS is that the continued loss of habitat in Washington County from development and recreational activities could threaten the continued existence of the bearclaw poppy and Holmgren milkvetch. In addition, a more detailed analysis of indirect impacts was undertaken to determine potential induced growth impacts from the Southern Corridor. This analysis included developing a No-Build and build development scenario. The analysis concluded that the area would develop with or without the Southern Corridor. Based on the indirect impacts analysis, there would be 2 acres of indirect impacts to Holmgren milkvetch and 8 acres to bearclaw poppy.</p>
	C-36.7	Threatened and Endangered Species	4.14	<p>Comment – We would like to see a more complete analysis of project alternatives, including a build alternative that more fully explores a non-automobile transportation solution.</p> <p>Response – See response to comment C-32.3.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-36.8	Threatened and Endangered Species	4.14	<p>Comment – We would like to see an alignment option brought forward in your analysis that avoids endangered plant habitat.</p> <p>Response - The alternatives considered were developed in consultation with federal and state resource agencies as well as local and state planning agencies. The alternatives carried forward for detailed analysis were based on the purpose and need for the Southern Corridor while considering the need to minimize impacts to endangered plant habitat and other resources such as archaeological sites. As shown in Section 2.1.4.6, an option that avoided endangered plant habitat was evaluated, but it was not carried forward for detailed analysis because it did not meet the project's purpose and need.</p>
	C-36.9	Threatened and Endangered Species	4.14	<p>Comment – In the next version of the EIS, we would like to see more complete data for the rare plants, including habitat and population trend data from the last 10 years, and a more sophisticated analysis of rare plant conservation based on population dynamics and seed bank protection.</p> <p>Response – The data analyzed in the EIS were based on field surveys and other information from BLM, state, and private organizations. In addition, the analysis in the FEIS includes recent surveys (2003 and 2004) conducted by SITLA of Holmgren milkvetch and bearclaw poppy in the project area. This additional data has resulted in a revised biological opinion being issued by the USFWS.</p> <p>The impact analysis included the actual number of acres of habitat impacted and conservation measures were developed in consultation with the USFWS. The EIS has been revised to include additional trend data but the results of the DEIS analysis are still valid. See response to comment C-57.7 regarding seed bank studies.</p>
	C-36.10	Threatened and Endangered Species	4.14	<p>Comment – We would like UDOT to reinitiate Section 7 consultation with USFWS based on all available rare plant information.</p> <p>Response – See response to comment C-32.2. Based on new information obtained since the September 2002 USFWS Biological Opinion was issued, FHWA has reinitiated the Section 7 process. The updated information is contained in Section 4.14, Threatened and Endangered Species Impacts and in the Amended Biological Opinion contained in Appendix C.</p>
	C-36.11	Threatened and Endangered Species	4.14	<p>Comment – The Poppy Recovery Plan should be revised and a Holmgren Milkvetch Recovery Plan should be created in advance of the Final EIS.</p> <p>Response – The analysis in the EIS is based on field surveys and research data for the noted plant species. The NEPA process requires that an analysis of plant species be conducted, but does not require the preparation of recovery plans. Recovery plans are the responsibility of USFWS.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Calvin and Mona Lowe	C-37.1	Alternatives	2.0	<p>Comment – We prefer the Troups plan which disperses the traffic and collects residents north, south, east, and west. Figure 2-7 in the EIS appears to be a proposed alternate in favor of tourists who want to load their cars in Las Vegas and speed to Zion National Park and never spend a dime at our local businesses. [The commenters also provided the PRC Troups Corps maps referenced in the original comment.]</p> <p>Response – Comment noted. See response to comment C-20.2.</p>
	C-37.2	Alternatives	2.2	<p>Comment – Build the belt route from 4300 West the shortest distance, least expensive, safest way possible.</p> <p>Response – Comment noted.</p>
	C-37.3	Purpose and Need	1.8	<p>Comment – Encourage Winding River to build a connector road from 3400 West and SR 9 through their property 80 feet wide, and the Lowes to build a 100-foot-wide connector road from 2800 West through their property, both with unlimited access which will allow residents easy entrance and exit from the road and disperse traffic throughout two massive subdivisions as shown in Figure 2-7 of the Draft EIS.</p> <p>Response – The purpose and need for the Southern Corridor is discussed in Chapter 1, Purpose of and Need for Action. The purpose of the road is to provide a regional transportation facility between St. George, Washington City, and Hurricane that would complement local land use plans. As proposed, your recommendation would not meet the purpose of providing a regional facility between the local communities but would only meet the need for addressing local traffic issues.</p>
Paul and Dory Woollard	C-38.1	Alternatives	2.2	<p>Comment – We prefer the 4300 West Alternative and are strongly against the 3400 West Alternative.</p> <p>Response – Comment noted.</p>
Elaine Mills	C-39.1	Alternatives	2.2	<p>Comment – We support the 2800 West Alternative.</p> <p>Response – Comment noted.</p>
Glen Mills – Kings Court Properties	C-40.1	Alternatives	2.2	<p>Comment – We support the 2800 West Alternative.</p> <p>Response – Comment noted.</p>
Lea Thompson – Thompson Family Pecan Farm	C-41.1	Alternatives	2.2	<p>Comment – We prefer the 2800 West Alternative because it will improve future traffic, it is the alternative the City of Hurricane prefers, and affected property owners are for that alternative.</p> <p>Response – Comment noted.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Jim Ward – Leucadia Financial Corporation	C-42.1	Alternatives	2.0	<p>Comment – We agree UDOT should secure adequate right-of-ways to support future growth, but for traffic only and not for pedestrians or other uses. UDOT's proposal for what is in effect an interstate highway is unnecessary. Based on our own studies [see comment C-43.1], the traffic numbers projected do not justify the expense of an interstate highway for at least 30 years.</p> <p>Response – To provide for alternative modes of transportation, the Southern Corridor includes a trail system for pedestrians and other users. As noted in Chapter 2, Alternatives, the proposed Southern Corridor would start off as a limited-access, two-lane facility with at-grade intersections. The proposed project would not develop into a four-lane, limited-access facility with interchanges until warranted by traffic demand. The timing of full build-out would depend on the rate of growth in the project area. To preserve the appropriate amount of right-of-way for the future, the ultimate build-out was analyzed in the EIS. Because the area is not currently developed, the actual number and location of the final interchanges identified in the EIS may change based on final growth and development patterns.</p>
	C-42.2	Alternatives	2.0	<p>Comment – The 2030 traffic numbers projected by UDOT indicate a need for only two interchanges instead of 10 to 12, and the other locations can operate as at-grade intersections. We request that UDOT reclassify the Southern Corridor as an at-grade, access-friendly expressway similar to the Bangerter Highway in the Salt Lake Valley.</p> <p>Response – See response to comment C-42.1.</p>
Joseph Perrin	C-43.1	Alternatives	2.0	<p>Comment – The EIS identifies that a four-lane freeway has an 89,000 AADT while a four-lane rural highway is closer to 39,000 AADT. The 2030 projected traffic volumes along the Southern Corridor include only one segment, I-15 to 1st interchange, where traffic is estimated to exceed the 39,000 capacity (Table 2.1-1, 2030 LOS, No-Build and Build Alternatives). With each interchange costing about \$10 million, the interchanges represent 60 to 80% of the construction costs for this project. The 2030 projected traffic numbers indicate a need for only two interchanges instead of 10 to 12, and the other locations can operate as at-grade intersections. We ask that you quantify the need for a freeway instead of the original parkway concept.</p> <p>Response – See response to comment C-42.1. In addition, the cost estimate for the proposed project given in the EIS does not include the cost of interchanges because the exact number and location would be based on future development that will occur in the project area.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-43.2	Alternatives	2.0	<p>Comment – Early in the Leucadia development project, the City of St. George and Leucadia developed a master plan with an at-grade parkway facility. Somehow this was changed to a rural freeway/interstate and the parkway was eliminated. A freeway that bisects the Leucadia property was not anticipated nor expected throughout the planning process with the City. We ask that you discuss why the at-grade parkway facility was eliminated from the alternatives. In addition, would a parkway change travel patterns, where are the likely interchanges actually needed based on capacity, and how does this change the projected costs?</p> <p>Response – See response to comment C-42.1.</p>
(No name provided)	C-44.1	Alternatives	2.0	<p>Comment – I prefer the alternative that will serve Sand Hollow [2800 West Alternative].</p> <p>Response – Comment noted.</p>
	C-44.2	Alternatives	2.0	<p>Comment – A roadway like the Snow Canyon Parkway would be better for environmental issues than a freeway design.</p> <p>Response – The Southern Corridor would initially be constructed as a two-lane facility similar to the Snow Canyon Parkway. The facility would not develop into a four-lane facility until warranted by traffic demand.</p>
Richard Spotts	C-45.1	Recreation, Water Body Modification and Wildlife Impacts	4.3, 4.12	<p>Comment – The DEIS does not acknowledge that significant impacts will likely extend south of the state line into Arizona. Much of the nearby lands to the south are administered by Arizona State Lands. This area has already received increasing levels of recreational uses due to the expanding development to the north. Evidence of these uses includes off-road vehicle tracks and accumulations of litter. The DEIS has virtually no mention of the Arizona BLM Strip Field Office.</p> <p>Response – The EIS addresses potential indirect impacts from development to recreational areas as well as BLM-designated ACECs. The increasing levels of recreational use will occur with or without the Southern Corridor as population in the area is expected to grow from about 50,000 to 200,000 by the year 2030. In addition, Figure 3-10 shows recreational resources in Arizona. The EIS has been revised to note that the impacts from increased use can occur on both Utah and Arizona BLM-administered public land.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Ray Urbaniak	C-45.2	Impacts on Considerations Related to Pedestrians and Bicyclists	4.7	<p>Comment – The DEIS does not address how the recreational trail that would parallel the Southern Corridor might connect, if at all, to other trails in the area. It also does not address the conflicts that may occur between different types of trail users such as motorized uses.</p> <p>Response – See Section 4.7, Impacts on Considerations Related to Pedestrians and Bicyclists, which notes that the proposed Southern Corridor trail would link to other trails in the study area that are shown in Figure 3-10. In addition, the proposed trail plan has been coordinated with the Washington County Regional Trails Cooperative. The trail along the proposed Southern Corridor would be a non-motorized trail to avoid potential user conflicts.</p>
	C-45.3	Land Use	3.1, 4.1	<p>Comment – I am concerned with the DEIS's limited references to special or protected areas. Section 3.1.2, Existing Land Use, does not mention Arizona's Paiute Wilderness Area or Grand Canyon-Parashant National Monument. The proposed Southern Corridor interchange at River Road would become a key access point for people to drive into remote areas of the Arizona Strip, including this national monument.</p> <p>Response – The EIS has been revised to include information regarding the Arizona Strip resources.</p>
	C-45.4	Threatened and Endangered Species	4.14	<p>Comment – The DEIS study area boundary and most species-specific status and trend descriptions are arbitrarily limited to Utah.</p> <p>Response – Direct construction-related impacts would be limited to Utah since this project would occur solely within Utah. Additional data regarding Arizona sensitive species and trend data have been added to the EIS.</p>
	C-45.5	Water Body Modification and Wildlife Impacts	4.12	<p>Comment – While the DEIS acknowledges habitat fragmentation, the DEIS discussion does not apply the described concepts to the actual facts and affected species, analyze the likely impacts, or explain what mitigation measures may be needed at specific locations to help reduce fragmentation impacts.</p> <p>Response – Section 4.12, Water Body Modification and Wildlife Impacts, provides an analysis of impacts to wildlife habitat and notes that only minor impacts would be expected because of fragmentation and barriers, as there are no known large migration corridors. An additional discussion of habitat fragmentation has been added to the EIS and mitigation measures have been included.</p>
	C-46.1	Alternatives	2.0	<p>Comment – The three alternatives do not provide a reasonable range of alternatives.</p> <p>Response – See response to comment C-32.3.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Ronald Thompson – WCWCD	C-46.2	Alternatives	2.0	<p>Comment – The DEIS acknowledges no impact from public transportation, even in the year 2030. It's important to give citizens and policymakers a smart growth alternative.</p> <p>Response – See response to comment C-32.3.</p>
	C-46.3	Alternatives	2.0	<p>Comment – The DEIS fails to make an adequate connection between the traffic needs generated by your model and the solution you've chosen. By your own admission, the build alternatives would <i>increase</i> traffic congestion on 7 of the 33 segments studied versus the no-build alternative.</p> <p>Response – See response to comment C-32.1</p>
	C-46.4	Threatened and Endangered Species	4.14	<p>Comment – This project would have devastating impacts on three endangered plant species. This highway could be the death knell for these plants.</p> <p>Response – See response to comment C-32.2.</p>
	C-47.1	Alternatives	2.0	<p>Comment – We believe that the 2800 West Alternative would best serve the long-range needs of the county. The Final EIS should mention that a benefit of the 2800 West Alternative is better traffic flow to and from Hurricane compared to the other alternatives.</p> <p>Response – Comment noted.</p>
Curt Gordon – SITLA	C-48.1	Alternatives	2.0	<p>Comment – Page S-2 and Figure 2-5. We concur that realignment noted here to avoid the Holmgren milkvetch is not a viable alternative for the reasons noted and also noted in the correspondence from Larry Bulloch, dated January 24, 2002. In addition, it is not clear from Figure 2-5 that the Southern Corridor has any impact on the habitat area mapped for the Holmgren milkvetch.</p> <p>Response – Comment noted regarding Figure 2-5. Because of the scale of Figure 2-5, it is difficult to show specific impacts to plant habitat. The Southern Corridor would result in impacts to Holmgren milkvetch habitat.</p>
	C-48.2	All	All	<p>Comment – Page 2-19, Chapter 11, and wherever applicable. The correct name is School and Institutional Trust Lands Administration (SITLA).</p> <p>Response – The EIS has been revised.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-48.3	Alternatives	2.0	<p>Comment – Pages 2-21, 2-24, 2-25, and 2-26. The interchange locations are expected to change based on the master plans for the development of SITLA's Southblock property. The Southblock Master Plan identifies interchanges at I-15 at the Atkinville Wash which also provide access to frontage roads; one about 1.5 miles southeast of I-15, one about 2.4 miles southeast of I-15, and one at River Road relocated to about 3.3 miles southeast of I-15. These are shown on the attached Exhibit 1.</p> <p>Response – Comment noted. As discussed in Section 2.2, Alternatives Considered, the final number and actual location of interchanges may change based on final growth/development patterns. Therefore, the interchange locations in the EIS are preliminary. Once the appropriate locations are finalized based on the future development, separate environmental documentation will be prepared.</p>
	C-48.4	Alternatives	2.0	<p>Comment – Page 2-39. There is no basis presented for the 300-foot total right-of-way width, except several references to protection of the Holmgren milkvetch, which has not been demonstrated to be located within the right-of-way. The total width of roadway improvements is only 140 feet. The total width with all the indicated allowances for slope easements, drainage and detention, and trail totals 226 feet. Therefore, the total right-of-way should be limited to 226 feet.</p> <p>The EIS, however, should include an analysis of a corridor of up to 400 feet. This is because the right-of-way necessary at an interchange is cited as 400 feet. As the location of interchanges is not fixed, the environmental clearance should consider that they could be located at any point along the right-of-way.</p> <p>The information contained in Figure 2-3 and Appendix A does not clearly indicate what is the geographic area covered by the EIS. For example, is the area of the interchange between the Southern Corridor and I-15 included in the project covered by the EIS?</p> <p>Response – Based on surveys conducted for the Southern Corridor project, Holmgren milkvetch habitat is within the right-of-way. The UDOT design standard for a four-lane facility in a rural area with a trail is 300 feet. In addition, because of cut and fill requirements, in many places the entire 300 feet would be required. The 400-foot requirement for interchange locations was considered for the proposed interchange locations shown in the EIS. This EIS provides general information about environmental impacts from interchanges; once locations are finalized, separate environmental documentation will be prepared. An analysis of the Atkinville interchange is included in the EIS.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-48.5	Alternatives	2.0	<p>Comment – Page 2-45. The No-Build Alternative roadway network is not a realistic representation of development of the Southblock property without the Southern Corridor. The development of the Southblock would require an east-west arterial roadway, generally along the alignment of the proposed Southern Corridor, connecting to I-15 at Milepost 2. The Atkinville interchange would not be deleted, but would be built to serve land development projects planned for the area, rather than as part of the Southern Corridor project.</p> <p>Response – The Atkinville interchange for this EIS is part of the Southern Corridor project and would not be built under the No-Build Alternative. The No-Build Alternative road network was developed in coordination with the local city planners.</p>
	C-48.6	Alternatives	2.0	<p>Comment – Page 4-4 and reference to Figure 4-1. Similar to the comment above, the interchange at Reference Post 2 would be required as part of the land development planned for the area. Thus the land use change from commercial to residential is not appropriate.</p> <p>Response – See response to comment C-48.5. Land use for the No-Build Alternative was developed in coordination with City of St. George planning.</p>
	C-48.7	Alternatives, Threatened and Endangered Species	2.0, 4.14	<p>Comment – Page 4-88. A field survey of the Holmgren milkvetch has been recently completed by SITLA on its property adjacent to the Southern Corridor right-of-way. Based on this new, more detailed data, the alignment most appropriate to avoid the concentration of milkvetch may be reconsidered.</p> <p>Response – UDOT met with SITLA in 2003 and 2004 and obtained the most recent survey information. The SITLA surveys and habitat areas are similar to those identified during the surveys conducted for the Southern Corridor. Based on the information provided by SITLA the alternatives in the EIS avoid to the extent practicable the Holmgren milkvetch.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-48.8	Alternatives, Threatened and Endangered Species	2.0, 4.14	<p>Comment – Page 4-89. There is no data or mapping information provided that would indicate that there is Holmgren milkvetch located adjacent to the Southern Corridor that would be protected by the 300-foot fenced right-of-way through the Southblock property. The total roadway improvements planned for the Southern Corridor at build-out are only 140 feet wide. Therefore, the additional right-of-way is not warranted, based on the data presented. SITLA has now completed a survey of the Holmgren milkvetch which identifies specific areas where it is located. The Southern Corridor right-of-way should be limited to that necessary for roadway improvements, slope and drainage improvements, and planned interchanges. Habitat for the Holmgren milkvetch should be acquired as mitigation for any impacts caused by construction of the Southern Corridor in a location that has been confirmed as an actual habitat area.</p> <p>Response – The initial development of the 300-foot right-of-way was not intended to protect plant or wildlife habitat but to meet UDOT safety standards. Because of the substantial variation in elevation throughout the corridor, the highway, multi-modal trail, and the cut and fill slopes will occupy the majority of the 300-foot right-of-way (see response to comment C-48.4).</p> <p>Holmgren milkvetch habitat has been identified in two locations. The Southern Corridor alignment in the southeast quadrant of section 25 is between Holmgren milkvetch habitat and the Atkinville Wash floodplain. The Southern Corridor alignment in this area was placed to have the least impact on the Holmgren milkvetch habitat while still avoiding the Atkinville Wash floodplain. The other Holmgren milkvetch habitat is in section 25 and can have the impacts further minimized by moving the alignment to the north. The alignment will be moved to the north at this location. Conservation areas to mitigate impacted habitat will be coordinated with USFWS.</p> <p>The 140-foot right-of-way described in the comment allows for the highway from edge of pavement to edge of pavement only. The 140 feet does not allow for safety (clear zone), maintenance access, the multi-modal trail, or the cut and fill slopes. Because the terrain varies in elevation, the cut and fill slopes vary dramatically over a short distance. The 300-foot right-of-way analyzed in the EIS is necessary to accommodate the cut and fill slopes along with the required safety elements and the trail.</p>
	C-48.9	Appendix A		<p>Comment – Appendix A. Although titled Roadway Plan and Profiles, no profiles are included in the document.</p> <p>Response – Comment noted.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-48.10	Alternatives, Floodplain Impacts	2.0, 4.13	<p>Comment – Appendix A, Page 1 of 20. Between approximately Station 2060+00 and Station 2095+00, the Southern Corridor right-of-way is located between a wash and several hills. The 300-foot right-of-way causes the roadway grading to impact the hills unnecessarily. The roadway right-of-way should be reduced as noted above, and the roadway relocated southward, with some adjustment to the alignment of the wash. This would reduce the grading impact on the hills and produce a more aesthetic design for the roadway. Also, the alignment of the eastbound lanes and westbound lanes can have different vertical profiles between interchanges, allowing them to traverse cross-slopes with reduced grading. If the location of future interchanges in the Southblock property can be fixed, this technique can be used to better match the roadway to the topography.</p> <p>Response – Executive Order 11988, Floodplain Management, established a federal policy “to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative.” Since the alignment noted above in the comment would impact the Atkinville Wash floodplain and the current alignment in the EIS is a viable option to avoid the floodplain, your adjustment would not be practicable to avoid floodplain impacts.</p>
Russell Bezette	C-49.1			<p>Comment – See comment C-32.</p> <p>Response – See response to comment C-32.</p>
Richard DeLappe	C-50.1			<p>Comment – See comment C-32.</p> <p>Response – See response to comment C-32.</p>
Daniel R. Patterson – Center for Biological Diversity	C-51.1	Comments and Coordination	8.0	<p>Comment – We request that you extend the comment period for the DEIS by 90 days.</p> <p>Response – NEPA requires a 45-day public comment period for a DEIS. FHWA provided a 50-day public comment period for the Southern Corridor DEIS. However, given the complexity of the document, FHWA extended the public comment period 30-days.</p>
Bob Hoffa – Grand Canyon Trust	C-52.1	Comments and Coordination	8.0	<p>Comment – We request that you extend the comment period for the DEIS by 60 days.</p> <p>Response – See response to comment C-51.1</p>
William H. King – Utah Native Plant Society	C-53.1	Comments and Coordination	8.0	<p>Comment – We request that you extend the comment period for the DEIS by 60 days.</p> <p>Response – See response to comment C-51.1</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Jean Binyon – Sierra Club, Utah Chapter	C-54.1	Comments and Coordination	8.0	<p>Comment – We request that you extend the comment period for the DEIS by 60 days.</p> <p>Response – See response to comment C-51.1</p>
Nina Dougherty and Mark Clemens – Sierra Club, Utah Chapter	C-55.1	Alternatives, Environmental Consequences	2.0, 4.0	<p>Comment – Many of our members in the state, as well as others from around the country, travel to and camp, hike, and enjoy the magnificent beauty, peace, quiet, and clean air in Zion National Park. All of these members would be impacted by sprawled development, lack of access to transit, air pollution, and unnecessary water and energy use resulting from construction of a freeway near the boundary of Zion National Park. The area for which the freeway is proposed is not just anywhere in the United States. It is, after all, the corridor leading up to one of the world's most beautiful and inspiring parks. In the immediate area where the freeway would be, instead of "physical constraints," we see fascinating, colorful geological features and fragile soils with significant plant populations.</p> <p>Response – The proposed Southern Corridor project at the 2800 West Alternative connection with SR 9 is about 14 miles by air and 25 miles by road from the boundary of Zion National Park. Chapter 4, Environmental Consequences, details the impacts to the environmental resources in the project area.</p>
	C-55.2	Alternatives	2.0	<p>Comment – The allegedly crucial regional transportation facility can wait until after 2010. It's difficult to avoid the conclusion that a specific new highway was the <i>a priori</i> [decided before the analysis] preference for UDOT, FHWA, and city planners, and the purpose and need of a regional transportation facility were manufactured to dictate the outcome. After spending quite possibly \$300,000,000 for this highway, the residents of Washington County will, according to the traffic model employed, enjoy a whopping 7.7% decrease in their travel times versus the No-Build Alternative by the year 2030. Why would the public realize so little benefit from such a substantial expenditure?</p> <p>Response – The primary purpose of the Southern Corridor is to provide a regional transportation facility between St. George, Washington City, and Hurricane that would complement local land use plans. It's also intended to reduce some traffic on existing and future roadways. Because the project's primary purpose is not to reduce existing congestion but to provide a regional connection, and given the small travel distance in the region, the project would not result in a large decrease in travel time in the region. In addition, Table 2.1-3, Build versus No-Build VMT, VHT, and Average Speed (Capacity Constrained), considers travel time on all roads in the region (St. George, Washington City, and Hurricane), many of which would not be affected by the Southern Corridor.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-55.3	Alternatives	2.0	<p>Comment –The purpose and need section assumes there will not be a much-enhanced transit system from what currently exists. The assumptions on transit need to be changed and a seriously enhanced transit system, with all the things that make it work, examined. The travel model did not use mode split capability. Since the current transit system is so limited, it would be useful to use the mode choices from other national park border cities that do have a good transit system. We are also dealing with a large senior citizen population in the St. George area. This population may be more interested in transit use than younger people. Assumption of a well-used, much-enhanced transit system would certainly change the presumed need for the proposed freeway.</p> <p>Response – The purpose and need addresses existing and expected future conditions. Potential transit alternatives are analyzed in Chapter 2, Alternatives. The transit system analyzed was based on known conditions in the St. George area. As discussed in Section 2.1.1.3, Mass Transit, the only types of transit that could serve the future growth would be rail, which could provide access, or buses, which would require new roads like the Southern Corridor to provide access to future development. The St. George area in 2030 would not have the densities, population base, or centralized business district to support a rail system. The purpose and need has been updated with the most recent information regarding bus service in the project area. Cities that border national parks have transit because there is a specific end destination (the national park) that lends itself to mass transit. Since there is no one end point in the St. George area, mass transit is more difficult.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-55.4	Alternatives	2.0	<p>Comment – Need for Smart Growth Alternative. The Smart Growth description should be analyzed as an alternative, not just provided as an information piece about what it is possible to achieve. The DEIS catalogues in Table 6.5-1 the many advantages of smart growth: more open space, 35% less water used, fewer vehicle-miles traveled, and less air pollution. Then the DEIS proceeds to ignore that analysis as though it's a mirage. It's not. All the build alternatives use VMTs that are either identical to, or insignificantly different from (Alternatives A and D differ by 1%), the VMTs the DEIS describes in Table 6.5-1 as the result of conventional development through the year 2030. It is imperative for the disclosure and consultation purposes NEPA requires for a rigorous smart growth alternative to be included in this analysis. The smart growth alternative should be further enhanced with a robust transit system, since more compact residences make a well-used transit system more possible.</p> <p>Response – See response to comment C-32.3. The Smart Growth chapter of the EIS was developed with FHWA, EPA, UDOT, and the local cities. The City of St. George has developed many of these principles in their most recent land use plan, which has been included in the EIS.</p> <p>NEPA requires that all reasonable alternatives be considered that meet the purpose and need of the project. The alternatives are based on current land use plans and growth projects provided by state and local governments and represent 2030 conditions. Decisions regarding future land uses are outside the authority of FHWA and UDOT. To develop a separate smart growth alternative without considering local planning would be speculative and could not be implemented without the approval of the local governments. The local governments have provided in their current land use plans the projected future uses.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-55.5	Alternatives	2.0	<p>Comment – The DEIS Analyzes an Inadequate Range of Alternatives. The principal difference among the three action alternatives is an insignificant distance between the termini on State Route 9. Alternative D terminates approximately 1.1 road miles (as measured along State Route 9) from Alternative A which itself terminates at a point only 1.3 road miles from the terminus of Alternative E. In addition to sharing exactly the same route for what appears to be 75 to 80% of their lengths—the analysis does not appear to provide that datum—all the build alternatives use exactly the same design standards and right-of-way.</p> <p>Response – See Chapter 2, Alternatives. Alignment options were developed in coordination with the local cities, BLM, and USFWS. Various alignment options were considered; however, because of the topography, purpose of being consistent with local land use plans, and need to avoid environmental resource areas, the final alignment options in specific areas were limited. With the large mesas, bluffs, and washes in the project area, topography was one of the major limiting factors.</p> <p>See response to comment C-55.6 regarding the right-of-way width.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-55.6	Alternatives	2.0	<p>Comment – Right-of-Way Width Alternatives. All the build alternatives are designed to identical specifications as shown in Figure 2-3. The right-of-way is at least 300 feet wide as shown in the figure (although one finds on p. 4-37 the confusing observation that the right-of-way is 328 feet wide); presumably the right-of-way is even wider still at interchanges. And along the fairly extensive segment where the Southern Corridor would be paralleled by a frontage road, the cumulative corridor might be as wide as 350 to 400 feet. Assuming a total right-of-way for highway and frontage road of 380 feet, such a monster would consume approximately 45 acres for every mile of highway. We're perplexed that given the DEIS's acknowledgement that 6.2 acres of bearclaw poppy habitat in the White Dome would be consumed by the alignment of all the build alternatives, no mitigation or alternative is even considered. Reduction or elimination of the 60-foot-wide median, or shifting the entire alignment south, suggest themselves as possibilities. Why weren't these possibilities included as an alternative?</p> <p>Response – All of the alternatives provided the same level of capacity, which results in a similar typical section as shown in Figure 2-4, Typical Section. The dimension shown on page 4-37 appears to be the result of a conversion error between U.S. standard units and metric units and will be corrected to read 300 feet.</p> <p>Figure 2-4 shows the requirements for the 300-foot right-of-way. The right-of-way was developed following UDOT standards for rural highways which accounts for safety requirements. The 60-foot median is required by current UDOT and FHWA standards to provide a safe "clear zone" area between the two directions of travel. Although a reduced median with a center barrier may slightly reduce the amount of bearclaw poppy habitat taken in the White Dome area, it would increase the potential for accidents with cars that may come into contact with the barrier. A study conducted for UDOT indicated that the average total accident rate is 1.29 accidents per million vehicle-miles traveled for a roadway with a narrow median that requires a barrier and 0.67 accidents per million vehicle-miles traveled for a wide median without a barrier. A narrow median with a barrier results in a 92% increase in accidents. In addition, to maintain a consistent driver expectancy of highway conditions, FHWA recommends keeping the right-of-way width consistent from one mile to the next. Because of the decrease in driver safety, a narrower right-of-way was not carried forward for detailed analysis.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
				<p>The Southern Corridor is not developing frontage roads throughout the length of the project. The potential indirect impacts of other development that may occur in the Dixie area including new roads were analyzed in the cumulative impact sections of the EIS. In the cumulative impact analysis, it was assumed that all private and state land would be developed and threatened and endangered species habitat on this land would be lost. Mitigation for impacts to threatened and endangered species from the Southern Corridor has been included in the EIS.</p> <p>See response to comment C-36.8 regarding moving the alternative alignment to avoid threatened and endangered species habitat.</p>
	C-55.7	Alternatives	2.0	<p>Comment – No-Build Alternative Improperly Analyzed. The analysis of the No-Build Alternative improperly considers only the potential disadvantages of the alternative. At Table 4.0-1 the DEIS shows 400 acres of new or expanded roadways for the No-Build Alternative versus 150 acres for each of the build alternatives. Presumably the difference of 250 acres is accounted for by the list of four new or expanded roads on p. 2-23 that would be developed only under the No-Build Alternative. Yet the reader searches Table 2.1-1 in vain for these new roads that would be added under the No-Build Alternative. How can one realistically evaluate the levels of service in 2030, as this table purports to do, without this information? At p. 4-20 one reads, “It is likely that expanding the arterial system would further increase congestion.” This sentence appears to be the only place at which the DEIS even deals with this question, and one need scarcely add this is not a quantitative analysis. Were these new or expanded roads even included in the traffic modeling?</p> <p>Response – The No-Build Alternative modeling included all roads in the local long-range plan. In addition to the roads noted in the long-range plan, excluding the Southern Corridor, the No-Build scenario developed for this EIS included the roads that would be needed if the Southern Corridor were not built to meet local land use plans. This network was developed in coordination with the local cities without considering the need to meet the purpose and need of building a regional road between St. George, Washington City, and Hurricane (which would require a project like the Southern Corridor). Because the primary purpose of the Southern Corridor is to provide a regional transportation facility between St. George, Washington City, and Hurricane that would complement local land use plans, a No-Build network would not meet this need; therefore, modeling these roads that were developed outside the long-range plan for purposes of showing LOS would not provide any pertinent information for the decision-making process. In addition, the No-Build network was developed to meet future land use plans, not to reduce LOS.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-55.8	Air Quality Impacts	4.8	<p>Comment – Impacts on Zion National Park Insufficiently Analyzed. There is little mention and virtually no impact analysis of the proposed freeway and resultant probable increased sprawl and air pollution on nearby Zion National Park. This is a very important national park that belongs to all of us, not just the people who may want to live in a low-density, auto-dependent fashion near Zion National Park. There needs to be a very serious study of the impact of this freeway and attendant low-density development on Zion National Park where there has been an excellent attempt to increase mobility and decrease pollution.</p> <p>Response – The proposed Southern Corridor would be about 14 air miles and 25 road miles from Zion National Park. The primary potential for impacts to Zion National Park would be to air visibility resulting from air pollution. These potential impacts are analyzed in Section 4.8, Air Quality Impacts. The EIS notes the potential for reduction in air quality at Zion National Park that could be caused by regional growth. It is stated in the EIS that the Southern Corridor would result in some changes to land use and may affect where growth occurs; however, the overall regional increase in population that would cause much of the air pollution would occur with or without the Southern Corridor. The Western Region Air Partnership has been established to address visibility issues at Zion National Park.</p>
	C-55.9	Environmental Consequences	4.0	<p>Comment – The Cumulative Impacts Analysis Is Inadequate – Major Federal Projects. At least three major federal projects are being considered in Washington County: Reference Post 13 Interchange, the replacement airport for St. George, and the Southern Corridor. The Southern Corridor DEIS at least makes reference to the other projects; obviously, therefore, these projects qualify as reasonably foreseeable future actions. This DEIS would be the appropriate document in which to undertake such an analysis. An example of the failure of the DEIS to provide a cumulative analysis of all these federal projects is found in the discussion of cumulative impacts to air quality on p. 4-46: “Overall, the growth in the area by the 2030 planning period would likely be the same with or without the Southern Corridor.” What we need to know—and the DEIS fails to give us—is how much different growth and air quality would be without the RP 13 Interchange, the proposed replacement airport, and the Southern Corridor.</p> <p>Response – If the proposed projects noted in the comment were not built (including the Southern Corridor), this would change the location of where developments would occur. However, as noted in the comment, regional growth would still occur. This EIS does analyze the potential cumulative impacts from this expected regional growth. The cumulative impact analysis as required by NEPA should analyze the proposed project with other reasonable future actions. NEPA does not require an EIS to include an analysis of not building other projects in the region.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-55.10	Environmental Consequences	4.0	<p>Comment – Cumulative Impact of Highway and Growth. The highway will likely induce increased auto dependence and sprawl, which will increase water, land, and energy consumption. All factors of this cumulative impact need to be analyzed.</p> <p>Response – The expected growth that would influence these resource areas would occur with or without the Southern Corridor (see response to comment C-55.8). The highway itself would not increase water, land, or energy consumption; this would be associated with regional growth. Chapter 6, Smart Growth, notes the projected resource use as a result of current growth patterns and the benefits to resource use from implementing smart growth principles.</p>
	C-55.11	Threatened and Endangered Species	4.14	<p>Comment – Bearclaw Poppy Habitat. In addition to this generalized failure of the cumulative impacts analysis, the DEIS fails to properly account for the cumulative impact of the Southern Corridor and the proposed frontage road in St. George on bearclaw poppy habitat. The authors of the DEIS are sufficiently aware of the plans of the City of St. George to build a frontage road along its segment of the Southern Corridor to include it on the map denominated Figure 2-7; however, in the description of the impacts of the Southern Corridor on p. 4-87 and p. 4-89, no mention is made of the frontage road. On p. 4-87, one reads, "Approximately one poppy and 6.2 acres of habitat would be within the ROW at White Dome." This discussion must disclose the cumulative impacts of all plans related to the Southern Corridor on endangered species at White Dome and elsewhere.</p> <p>Response – The cumulative analysis for proposed threatened and endangered plant species does not specifically mention every road that is likely to impact these species. Plus, since the exact location of these roads is not known, it would be speculative to give specific amounts of habitat affected. However, these projects are included in the 37% of poppy habitat on state and private land addressed in the cumulative impact analysis as being developed. Although not all of this land is expected to be developed, it was assumed for the analysis that all 2,484 acres of state and private land would be developed. The results of the analysis note that, with the loss of this habitat, the existence of the species could be threatened.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-55.12	Threatened and Endangered Species	4.14	<p>Comment – Violation of the Endangered Species Act. The common alignment violates the Endangered Species Act. Although the State of Utah Dwarf Bear Claw Poppy Recovery Plan was approved in 1983 and the USFWS approved a recovery plan in 1985, no significant funding or effort has been implemented by either agency to protect and recover the species. The population trend for the poppy has been downward in recent years, and additional habitat has been lost. In light of these agency failures, any further loss of poppy habitat in the White Dome area is unacceptable. At least one alignment alternative should move further south to avoid poppy habitat entirely.</p> <p>Response – See response to comment C-32.2 regarding the violation of the Endangered Species Act. Previous funding requirements for the poppy are outside the scope of this EIS. Any mitigation required for the Southern Corridor project will be funded as part of the construction phase. See response to comment C-36.8 regarding moving the alternative alignment to avoid threatened and endangered species habitat.</p>
	C-55.13	Threatened and Endangered Species	4.14	<p>Comment – The measures to protect endangered plants from the destruction of habitat and taking of individual plants caused by the Southern Corridor are all in the conditional mode. On p. 4-89, one reads, “In addition, the Warner Ridge population could be protected by the Southern Corridor by limiting interchanges and reducing OHV access between the Redhawk subdivision and Washington Dam Road.” One could just as easily present the counterargument that the highway itself will bring additional traffic into the area from which additional OHV pressure on habitat will result. One also reads on p. 4- 89, “Fencing White Dome has already been proposed in the Washington County Habitat Conservation Plan and is the recommended mitigation for maintaining poppy habitat.” It is not satisfactory to substitute pious palaver for an actual plan, and to describe these vague wishes as “active conservation (mitigation) measures” as the DEIS does on p. 4-87 is inaccurate.</p> <p>Response – The EIS notes that the expected regional growth that would occur with or without the Southern Corridor would increase pressure on sensitive plant species. However, BLM believes that the highway would allow them to better control access to the Warner Ridge area independent of increasing or decreasing recreational use. No interchanges would be placed in the most critical areas of Warner Ridge. Fencing White Dome is not part of the mitigation for this project, but is mentioned as one of the proposed plans to be implemented in the area. The Southern Corridor mitigation would consist of purchasing and protecting in-kind habitat for that lost as a result of the project.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-55.14	Section 4(f)	5.0	<p>Comment – Inadequate 4(f)/6(f) Analysis. The sections 4(f)/6(f) evaluation is inadequate. White Dome was designated an ACEC by Governor Scott Matheson on 3 February 1984. Nowhere in Chapter 5 is the significance of this designation considered for qualification of White Dome under section 4(f).</p> <p>Response – An ACEC is a BLM designation. Since White Dome is on land owned by the State of Utah, it cannot be a federally designated ACEC. The letter from Governor Scott Matheson was reviewed which does include White Dome being listed as a state ACEC. Using the description of the ACEC boundary provided by the State, the Southern Corridor is outside of the state-designated ACEC boundary.</p>
Cynthia Cody – EPA	C-56.1	Smart Growth	6.0	<p>Comment – We would like to make it clear that the greatest impacts associated with this highway project are the indirect and cumulative impacts associated with the growth surrounding a new highway alignment. It is therefore very important that the information in Chapter 6 on Smart Growth be circulated and shared with interested parties in the community.</p> <p>Response – The Smart Growth chapter has been included in the EIS to provide this information to the public and other interested parties. In addition, UDOT and FHWA have been providing the information to the local planners through the established Southern Corridor Committee.</p>
	C-56.2	Environmental Consequences	4.0	<p>Comment – BLM Right-of-Way. The DEIS states that this document will be adopted by BLM to fulfill BLM's NEPA compliance requirements pertaining to a right-of-way (ROW) grant across public lands for this project (see page 1-1). We do not think the appropriate analysis has been done for NEPA compliance for the BLM ROW. Section 4.12.2 on Wildlife Habitat contains a statement that BLM will manage suitable public land habitats for recovery or reestablishment of native populations through collaborative planning; however, information on how that will be accomplished is missing. Section 4.3.8.2 states that the greatest impact of this project would be use of the undeveloped desert and sensitive environmental areas as the population increases. How this impact will be managed is not addressed in this document.</p> <p>Response – A meeting was held with BLM to discuss management of land adjacent to the Southern Corridor. The St. George Field Office Resource Management Plan provides details on how BLM will manage resources in the project area including impacts from growth and development. BLM has indicated that the objectives in the plan are general enough to adequately capture the management necessary for the Southern Corridor and expected growth. More details regarding specific management objectives are included in Appendix J.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-56.3	Environmental Consequences	4.0	<p>Comment – We suggest that 1) A map be included in the document of the BLM lands and the ROW; 2) If the St. George Field Office Resource Management Plan includes this proposed ROW, the impacts and management measures should be disclosed or addressed in this document. If not, an additional NEPA document or an amendment should be done. At a minimum, it should address impacts from increased OHV traffic, increased recreational use from the increasing population and access, species of concern and how they will be protected, and management options for providing a barrier to these lands to reduce these impacts. For this document to be used as the NEPA document for the BLM ROW, significant additional information, with opportunity for public comment, will have to be added. If this is not modified, the statement on page 1-1 should be taken out, and a separate NEPA document prepared for the BLM ROW, but that would not be the streamlined approach.</p> <p>Response – Figure 3-1, Existing Land Use and Land Administration within 1 Mile of the Alternatives, shows BLM, state, and private land administration. The Resource Management Plan does mention the Southern Corridor project, but does not provide details regarding a specific alignment and instead provides details on how BLM will generally administer their publicly owned land. This information has been included in the EIS. This EIS provides specific information regarding the impacts of the Southern Corridor on BLM-administered public land. The associated growth in the region and the increased pressure that this growth might have on BLM-administered public land will occur with or without the Southern Corridor. The EIS has been modified to include more information regarding impacts to BLM-administered public land.</p>
	C-56.4	Purpose and Need, Environmental Consequences	1.8, 4.0	<p>Comment – At the outset of this project, BLM indicated an interest in using the Southern Corridor as a barrier to sensitive public lands. We recommended that this would be an appropriate additional purpose for this project. This purpose was not included and the scope of analysis did not address impacts on BLM land. In particular, the placement of interchanges may have an impact on BLM land. Alternatives with these impacts in mind could have been addressed.</p> <p>Response – Although providing a barrier to sensitive land was not a purpose of the project, it was mentioned in Chapter 1, Purpose of and Need for Action, as a benefit of the project, and the alignment was placed along some sensitive plant habitat to act as a barrier. Because the Southern Corridor would result in direct impacts to the environment and the alignment could not be shifted to protect all sensitive areas, it would not be reasonable for the highway to be used as a barrier along its entire length or included as a purpose of the project. In addition, there is one planned development that will occur on the south side of the highway.</p> <p>An analysis of interchange locations has been added to the Final EIS.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-56.5	Alternatives	2.0	<p>Comment – Preferred and Environmentally Preferred Alternatives. FHWA did not select a preferred alternative, nor did they define an environmentally preferred alternative. When a preferred alternative is not selected in the DEIS, per EPA policy, we rate all alternatives. In the Final EIS, we recommend that FHWA determine which of the alternatives is the environmentally preferred alternative. According to CEQ's policy, FHWA must select a preferred alternative in the Final EIS and an environmentally preferred alternative in the ROD [Record of Decision]. If FHWA does not select an environmentally preferred alternative, EPA can recommend one at the DEIS stage. The three build alternatives are so similar that it would be hard to select one over the other two. However, if protection of BLM land were included with one of the alternatives, EPA would likely consider this the environmentally preferred alternative.</p> <p>Response – Comment noted. A preferred alternative will be provided in the Final EIS and an environmentally preferred alternative in the ROD.</p>
	C-56.6	Alternatives, Smart Growth	2.0, 6.0	<p>Comment – General Alternatives Comment. The three build alternatives are very similar. It would have been helpful for comparison to have an alternative that incorporates smart growth principles as a reasonable alternative to the three Southern Corridor build alternatives.</p> <p>Response – Comment noted. A comparison of the current conventional development and a smart growth option is provided in Chapter 6, Smart Growth. Also see the response to comment C-32.3.</p>
	C-56.7	Alternatives	2.0	<p>Comment – Section 2.2. Ten potential interchanges are included in the analysis of each alternative. This is one feature of a new alignment in which alternatives (number and location) can significantly affect the indirect and cumulative impacts from growth and increased VMT. We understand that FHWA will not be making the decisions on number and location of interchanges. It is important for comparison purposes, however. It would have been helpful to analyze various scenarios of interchanges for their impacts. This analysis would be helpful to planners who are considering the information in Chapter 6 in how to develop the areas adjacent to the highway. (See Section 4.1.1.2 [comment C-56.15] for additional comment on this.)</p> <p>Response – Although the exact location of interchanges has not been determined, an analysis of the impacts from potential locations has been added to Section 4.1, Land Use Impacts. This analysis includes where interchanges and development should not occur.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-56.8	Air Quality, Water Body Modifications and Wildlife Impacts	4.8, 4.12	<p>Comment – Table 2.1-3 shows that the average trip length measured in hours decreases but that vehicle miles traveled (VMT) and speed increase. This tells us that drivers will be going faster over longer distances, which may have an impact on wildlife/vehicle collisions and potentially air emissions. As VMT goes up, so potentially do air toxic emissions and NO<sub>x</sub>. Please disclose these impacts in the document.</p> <p>Response – Potential NO<sub>x</sub> emissions were analyzed based on regional VMT and overall speeds in Table 4.8.2, Estimated Regional Emissions for Highway Vehicles, Highway Network Totals for St. George/Hurricane/Washington County in 2030. This table also includes information on PM<sub>10</sub>, CO, SO<sub>2</sub>, and VOCs. Potential wildlife/vehicle collisions were addressed in Section 4.12.4, Indirect Impacts on Wildlife. Because of the nature of the habitat quality and the low density of any one species, no adverse impacts to the population size of any one species are expected in the project area.</p>
	C-56.9	Alternatives, Smart Growth	2.0, 6.0	<p>Comment – Section 2.1.1.3, Mass Transit. It is worthwhile to note that although the area is not suited to mass transit now, there are ways to plan for the growth that would allow for a viable mass transit system (i.e., buses and vans in this area) in the future. These could be outlined for future planning.</p> <p>Response – A section has been added to Chapter 6, Smart Growth, regarding measures that the cities can implement to improve transit ridership and reduce vehicle use. A reference to this section was added to Section 2.1.1.3, Mass Transit.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-56.10	Alternatives, Environmental Consequences	2.0, 4.0	<p>Comment – Section 2.2.1, No-Build Alternative. We commend you on the work done to develop and analyze the no-build scenario. It is noted on page 2-22 that all the road improvements associated with the no-build would be included in the build alternatives also. It is not clear, however, whether these impacts were factored into the analysis of the build alternatives as they were in the No-Build Alternative. If the improved road system was not factored into the build alternatives, the analysis should be revised to reflect this.</p> <p>Response – The roads currently in the long-range plan are included in both the No-Build and build alternatives. The roads improvements detailed in Table 2.2-2, Comparison of No-Build and Build Alternatives 2030 Road Network, would occur only under the No-Build Alternative as a result of the Southern Corridor not being built.</p> <p>The cumulative impact analysis in Chapter 4, Environmental Consequences, considers the impacts associated with growth in the region, which includes both development and associated roads planned for the area. For example, the cumulative impact analysis for threatened and endangered species includes the acreage that would likely be developed (including roads) in the future. These road projects are not part of the Southern Corridor project, and therefore a site-specific detailed analysis is not required.</p>
	C-56.11	Comparison of Alternatives	2.4	<p>Comment – Table 2.4-1, Comparison of Environmental Impacts. We recommend that the text under the water quality resource category of this table include the amount of impervious surface that will be needed for each alternative, and that this be one of the impacts that is considered in designating the environmentally preferred alternative. In the water body modification resource category, it is not clear whether the acreage for the build alternatives includes the acreage from the No-Build Alternative, given the comment above that roads built for the no-build will probably be built with the build alternatives as well.</p> <p>Response – Text has been added to Table 2.4-1 regarding the increase in impervious surfaces. The acreage provided is for the specific impacts associated with the Southern Corridor. The other road acreage not part of the Southern Corridor would be associated with indirect impacts; this information has been added to Section 4.12, Water Body Modification and Wildlife Impacts. See response to comment C-56.10.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-56.12	Affected Environment	3.0	<p>Comment – It would be helpful to have just a paragraph on how this area fits into the Colorado Plateau, the ecosystem in which it lies. The Colorado Plateau, one of the most ecologically diverse areas in the world, is undergoing profound economic and demographic transformation. Extensive growth and impacts from expanded tourism are having an impact on the fragile natural and cultural resources in the area. Because of the nature of the ecosystem, the fragility of desert ecosystems, and the cultural resources, recovery from these impacts is slow and in some cases may never occur. This information may explain the big picture and why it is so necessary to protect the BLM lands in the project area.</p> <p>Response – Washington County lies within two geologic/physiographic provinces, and between these is a transition zone. The eastern province is the Colorado Plateau, which makes up the eastern third of Washington County. The western province is the Great Basin, which makes up the western two-thirds of Washington County. In the general area of the Southern Corridor, the native plants and wildlife are typical of those associated with the Mojave Desert. BLM felt that such a paragraph would confuse the reader with data outside the specific study area.</p>
	C-56.13	Environmental Consequences	4.0	<p>Comment – Table 4.0-1. Given the statement made in Chapter 2 that the roadway improvements for the No-Build Alternative would likely be built for the build alternatives also, this table does not make sense. The additional acreage for “other major local roadways developed” should be similar for all four alternatives.</p> <p>Response – The information in Table 4.0-1, Acres of New Roadways, No-Build and Build Alternatives, includes the number of acres of new or improved roadway required if the Southern Corridor is not built (the No-Build Alternative). If the Southern Corridor were not built, about 400 acres of new or improved roads would be required. If the Southern Corridor were built, about 150 acres of new or improved roads would be required. The 250 additional acres required under the No-Build Alternative would be needed to provide the lost access of the Southern Corridor. The EIS text has been revised to clarify this.</p>
	C-56.14	Land Use	4.1	<p>Comment – Section 4.1, Land Use Impacts. This is one of the best land use impacts chapters we have seen in a transportation EIS. There is a great deal of information in here on the differences in the development that will occur between the build and no-build scenarios that should be important to local planners.</p> <p>Response – Comment noted.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-56.15	Land Use	4.1	<p>Comment – Section 4.1.1.2, Indirect Impacts of Interchange Number and Locations. The document states that 10 interchanges have been initially identified by the cities to satisfy expected development. The section explains that the placement and number of interchanges can have an impact on the environment, but does not analyze the differences at all. While we agree with this section, it is not clear that any environmental analysis will be done before interchanges ultimately will be selected. As stated earlier, a comparison of scenarios on impacts from placement and number of interchanges would be helpful. We are uncertain that this analysis will be done at a later date and believe that the interchange impacts are indirect impacts of this project which should be analyzed. This information is needed by land use planners who may not get this information if it is not done here as well as to protect the BLM land.</p> <p>Response – See response to comment C-56.7.</p>
	C-56.16	Land Use	4.1	<p>Comment – Table 4.1-1, Cumulative Land Use Impacts. This section contains some really good information on acres developed. It states that about 27,700 acres have been developed and 309,300 acres are available for future development. The question remains whether those acres available for future development can be developed in a way that minimizes future environmental impacts. Is there a way to develop sustainably so that the environmental impacts are reduced? This section refers to Chapter 6 on Smart Growth. We would suggest adding information on how many acres in fact can be left undeveloped under a smart growth scenario, from Table 6.5-1, or in fact putting the whole table in this section, as well as in Chapter 6, for emphasis on the environmental benefits of sustainable development.</p> <p>Response – The total acres available for development in the county are about 225,300, not 309,300 as stated in the comment. These 225,300 acres include the 84,700 acres of urbanized area noted in the table. Information on land use from the smart growth option was included in the land use section in Table 4.1-2, Comparison of Alternative Plan and Current South Block Framework Plan, 2030. The table includes the information regarding open space/wildlife habitat under the smart growth option.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-56.17	Recreation Resources	4.3.8	<p>Comment – Section 4.3.8. This section makes it apparent how important a barrier will be if the Southern Corridor is built. Again, a commitment from BLM on management of these lands or additional information on the impacts to BLM land from this project is necessary in this document. In particular, the Warner Ridge ACEC, which the document states may be potentially limited given the bearclaw poppy habitat, may need special management considerations. There is reference to use of the Southern Corridor as a barrier, but no BLM commitments in the document. Special measures from FHWA in constructing the highway (e.g. [for example], highway design as barrier or interchanges) could also be looked at in the document. The mitigation measures are inadequate to reduce impacts to the undeveloped desert and sensitive environmental areas as the population increases.</p> <p>Response – See response to comment C-56.2.</p>
	C-56.18	Air Quality	4.8	<p>Comment – Section 4.8, Air Quality Impacts. The air quality impact analysis done for this project is very good. The description of methodology is appreciated.</p> <p>Response – Comment noted.</p>
	C-56.19	Air Quality	4.8	<p>Comment – Sections 3.8.2 and 4.8.5, Air Impacts to Zion. It is not clear why the Zion National Park visibility data from the northwest boundary of the park noted in the DEIS was not presented in addressing cumulative impacts and impacts in Class I areas. The Zion monitoring location is much closer than the Bryce Canyon data that was presented. This is a significant issue as the cumulative impacts of high growth in the St. George area and transport from Las Vegas will have an increasing impact on visibility in the Class I area of Zion National Park.</p> <p>Response – As noted in the DEIS (page 3-30), visibility data are extremely limited for the Zion National Park area. At the time of the DEIS, only one year of visibility data was available from a monitor at the northwest corner of the park adjacent to I-15. One year of monitoring data is insufficient to establish a visibility baseline or to suggest visibility trends in the park. The only available trend data were for Bryce Canyon National Park.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-56.20	Air Quality	4.8	<p>Comment – Section 4.8.2, Construction Emissions. The 2002 and 2003 estimated PM<sub>10</sub> for construction emissions is 697 and 630 tons/year respectively. The DEIS states that “This change is too small to have a major effect, and there would be no long-term effects because the emissions would be temporary.” However, the DEIS states that one phase of construction is expected to last 4 years, which we would not consider short term. While the estimated construction PM is “less than 5% of the baseline” PM<sub>10</sub> emissions from construction for the entire county, it is significant when all 5% is concentrated in one corridor.</p> <p>For comparison purposes, the vehicular highway PM<sub>10</sub> emissions estimate for all of Washington County is approximately 766 tons/year. At 697 tons/year for construction in 2002, the corridor construction emissions will nearly double the highway PM<sub>10</sub> emissions for the entire region for the years that construction takes place, and all 697 tons will be concentrated in one corridor. Construction mitigation measures are appropriate. The extremely dry climate and unpaved areas are likely to create a construction scenario that will produce huge amounts of dust in addition to the large amounts of PM<sub>10</sub> emissions associated with diesel-powered construction equipment. Significant mitigation including dust suppression, truck washing, street sweeping, equipment idling restrictions, on-road grade diesel fuel, alternative fuels (biodiesel), and emission-controlled equipment should be considered.</p> <p>Response – As noted in the DEIS, Washington County is an attainment area for all priority pollutants. As a result, a federal air quality conformity determination is not required for the proposed project. Nonetheless, according to federal conformity regulations (40 CFR Part 93, Subpart A Section 93.152—Determining Conformity of General Federal Actions to State or Federal Implementation Plans), projects are considered “regionally significant actions” if they result in direct and indirect emissions that represent 10% or more of a non-attainment or maintenance area’s emission inventory for that pollutant.</p> <p>PM<sub>10</sub> emissions in Washington County are approximately 10,587 tons per year (Table 3.8-4, 1994 Project Area Existing Emissions, in the DEIS); therefore, even if Washington County were a non-attainment or maintenance area (Washington County is in an attainment area), the estimated PM<sub>10</sub> construction emissions (697 tons per year) would be less than 10% of the regional emission inventory. Thus, if the project was covered under General Conformity rules, it would not be considered regionally significant.</p> <p>Additional construction-related mitigation has been added to the EIS.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-56.21	Air Quality	4.8	<p>Comment – Section 4.8.3.2, Emission Modeling. In the emission modeling using Mobile 5b and CAL3QHC it appears that a free-flow speed of 70 mph was used. For the segment analyzed, Table 2.1[-1] shows LOS D. It is not clear whether a) the 70 mph free-flow speed was used; and b) the 70 mph free-flow is representative of LOS D. If LOS D is not a 70 mph free flow, the estimated maximum 8-hour average CO concentrations in Table 8.4-4 would be higher. As the estimated concentrations grow closer to the NAAQS, it may be necessary for the UDEQ to consider a monitoring program in the future.</p> <p>We have enclosed information used by EPA Regions 9 and 10 on construction mitigation options. Many of these are applicable here.</p> <p>Response – As noted in the DEIS (page 4-43), an average speed of 65 mph was used to estimate CO emission rates with the MOBILE5b model because that is the upper speed limit allowable by the model. In addition, the highest-volume traffic segment was used to model CO emissions; therefore the modeled scenario was conservative (that is, the worst case). In addition, MOBILE5b emission rates generally decrease from the upper speed limit of 65 mph to about 45 mph before increasing again. Therefore, had slower speeds been used in the model, CO emissions would have been less than those reported in the DEIS. Therefore, the modeled traffic volumes and speed limits were worst-case conditions and did not violate the applicable air quality standards. We have added additional mitigation measures, but many of those measures were developed for an urban area where local populations are adjacent to the project. Most of the Southern Corridor is in an undeveloped area with no nearby sensitive receptors.</p>
	C-56.22	Noise	4.9	<p>Comment – Section 4.9.4, Cumulative Noise Impacts. This section should include a noise evaluation from the updated St. George airport environmental assessment. In addition, this section should discuss the noise impacts to Zion National Park from all the growth in the area, as well as the new highway and airport.</p> <p>Response –The noise contours from the St. George replacement airport Environmental Assessment were considered in the cumulative impact analysis as noted in Section 4.9.4, Cumulative Impacts. The results of the analysis concluded that cumulative noise levels would be similar to those of an urban environment. Currently, there are no sensitive receptors in the project area that would be affected. Because the Southern Corridor is about 14 air miles from Zion National Park, no noise impacts would occur. Most of the regional growth is expected in St. George, Washington City, and Hurricane, which are not adjacent to the park and therefore would not increase noise levels. Noise impacts from the replacement airport on the park are being considered in an EIS being prepared by the Federal Aviation Administration.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-56.23	Water Quality	4.10	<p>Comment – Section 4.10, Water Quality Impacts. The water quality section is well done. There is an excellent discussion of typical highway runoff contaminants, and a good discussion of Total Dissolved Solids (TDS) and Total Suspended Solids (TSS). A summary of BMPs to be used during construction and beyond would be beneficial.</p> <p>Response – As noted in the EIS, BMPs would be developed under the stipulation of the UPDES permit. Because the permit has not been issued, exact measures cannot be determined. However, the EIS has been updated with measures typically required in the UPDES permit. These BMPs for construction include silt fences, silting basins, retention ponds, straw bale check dams, and slope drains. Permanent BMPs after construction would include roadside ditches and retention basins designed to retain all runoff from a 10-year storm event. In addition, after construction the disturbed right-of-way would be vegetated with plant species native to Washington County to be used as vegetative filter strips.</p>
	C-56.24	Water Quality	4.10	<p>Comment – Section 4.10.2. Although de-icing will be just a once-a-year event, it will still be necessary to have mitigation measures as de-icing salts will contribute to the TDS levels, already a TMDL issue in the Virgin River and this area.</p> <p>Response – The de-icing salts might be used once a year, but in many winters (including 2002–2003) no application was required. During any event that requires the application of de-icing salts, the amount of snow that would cause runoff from the road is small. It is not expected that one event a year would increase TDS levels in the Virgin River. In addition, as discussed in Section 4.10.2.2, the project would include retention of a 10-year storm event, which would minimize any pollutants from storm water runoff.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-56.25	Water Quality	4.10	<p>Comment – Section 4.10.2. The document states that “Of the 87,700 acres of land available for development, 23,000 would be used for roadways and highways.” The first number on land available for development is not the same as the number in Table 4.1-1. Unless we are reading the table wrong, it is the number for the land available in urbanized areas, but does not include the land available in the county. Under the No-Build Alternative, this section states that about 250 additional acres of major roadways would be needed in lieu of the Southern Corridor. Again, it is stated elsewhere that the roads required for the no-build analysis would be built under the build scenarios as well. These numbers need to be consistent. It would be helpful to compare total impervious surface numbers for each of the alternatives in this section.</p> <p>Response – The developable land used in the analysis was only the acreage in the urbanized area, not the county. The Southern Corridor is planned to be built in the urbanized area of Washington County and therefore that acreage was used. Much of the other developable land in the county is far removed from the urbanized area and therefore was not included in the analysis. In addition, most of the growth is expected to happen in the urbanized areas. The 250 acres are the difference between the No-Build and build alternatives (see response to comment C-56.13) and would not be required if the Southern Corridor is built.</p>
	C-56.26	Water Quality	4.10	<p>Comment – Section 4.10.2.2, Table 4.10-2. Please explain why TSS values for the existing (does this mean no-build?) scenario are larger than other alternatives.</p> <p>Response – Projected TSS values under the build alternatives decrease because the typical concentrations found in urban storm water runoff are less than the average background TSS concentrations in the Virgin River. In addition, the Southern Corridor would pave over areas with high soil erosion potential and further reduce sediment (TSS) loads to the Virgin River.</p>
	C-56.27	Water Quality	4.10	<p>Comment – Section 4.10.2.2, Stormwater. There is a statement to the effect that the Southern Corridor design would include roadside ditches and detention ponds to retain all highway stormwater runoff for a 10-year storm event. An agreement or requirement in effect to require this should be referenced or in place. Please elaborate on how UDOT will ensure that this will occur.</p> <p>Response – This measure will be included in the design and is noted as a mitigation measure. UDOT has a policy to track all mitigation commitments noted in an environmental document to ensure that they are implemented.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-56.28	Water Body Modification and Wildlife Impacts	4.12	<p>Comment – Section 4.12.2, Wildlife Habitat. Under the No-Build Alternative, it is stated that 400 acres of major roadway pavement would be required, about 365 of which would be new alignment. These numbers are not the same as elsewhere in the document. And, again, does the analysis for the build alternatives include the 400 acres associated with the No-Build Alternative given that these roads will be built anyway? It seems that if these numbers are not included for the build alternatives, the impacts for them are minimized.</p> <p>Response – See the response to comment C-56.13 regarding the roadway acreage under the No-Build and build alternatives. The cumulative impact analysis for the build alternative includes all land expected to be developed, which includes roadways (about 23,000 acres).</p>
	C-56.29	Water Body Modification and Wildlife Impacts	4.12	<p>Comment – Section 4.12.3. We submit that habitat fragmentation is a very important issue with a highway like this and that it is a direct as well as an indirect impact. The discussion in Section 4.12.4 on habitat fragmentation and roads as a barrier to wildlife is excellent. However, we believe more measures may be required to mitigate for this impact. We agree with the statement made that cities will need to implement land use planning that reduces the amount of area for development and lessens the habitat fragmentation impact. Development guidelines or agreements from the cities to address this issue would be appropriate in this document as mitigation.</p> <p>Response – Although there are no known movement corridors in the project area, the Final EIS has been modified to recommend designing bridges to allow for easier wildlife crossings and/or adding large box culverts at most dry wash crossings for wildlife. These options would allow wildlife to cross the highway in more places that might coincide with natural movement patterns. These options are in addition to the bridge proposed across the Fort Pearce Wash riparian area.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
				<p>In addressing cumulative impacts, such as the longer-term habitat fragmentation due to the growth of the St. George urbanized area, the proponent of a project is responsible for identifying, to the best of their ability, the recent past and future projects that may reasonably be expected to occur. These projects and the proposed action are then evaluated as to the magnitude of the cumulative impact and whether the proposed action contributes to the significance of the cumulative impact. In the case of the proposed Southern Corridor project, the projected growth and urbanization in the St. George region are expected to result in cumulative impacts with or without the proposed action. The impact of the proposed project would be a minor increase in the cumulative fragmentation of habitat in the St. George, Washington County, and Arizona Strip region.</p> <p>As such, it is not appropriate for the proponents of the Southern Corridor project to obtain from, or provide to, the local cities or the county development guidelines or agreements as mitigation for the proposed action. These are guidelines and agreements that the local jurisdictions in conjunction with their jurisdictional neighbors, BLM and USFS, need to work out. These agreements may also need to be implemented under the Natural Community Conservation Plan (NCCP) process in conjunction with USFWS, where the local jurisdictions develop multi-species habitat conservation areas to protect wildlife movement corridors and sensitive species habitat areas. Also, text was included in the Draft EIS on how the local communities could minimize cumulative impacts to wildlife through land use planning.</p> <p>It is important to note that the local communities have already developed a multi-species conservation area in the 62,000-acre Red Cliffs Desert Reserve. One of the primary objectives of the reserve was to allow development to occur in the areas south and east of I-15.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-56.30	Threatened and Endangered Species	4.14	<p>Comment – Section 4.14.3, Cumulative Impacts to Wildlife. The cumulative impacts do include growth in the area. This section states that about 6.2 acres of bearclaw poppy habitat is within the Southern Corridor ROW and would be affected by construction, about 0.1% of total area habitat. But, the indirect and cumulative impacts would be much larger. We suggest including the number of acres of bearclaw poppy that could be affected with the growth in the area, a more important number. Some of this information may be included in the work being done under the EPA grant to the City of St. George. It is noted that FHWA and UDOT shifted alignment of the highway to avoid poppy habitat, but more mitigation may be required to address the indirect impacts of growth on the poppy. This is something that can be handled by an agreement with the local responsible agency to minimize impacts to the poppy (and milkvetch) when considering growth plans on private lands, or management measures on BLM or other public land.</p> <p>Response – The number of acres of habitat that could be affected by cumulative impacts was included in Table 4.14-2, Land Ownership Acres for Holmgren Milkvetch and Bearclaw Poppy Habitat, in the DEIS. The text in the EIS notes that all private and state land could be developed, which represents 37% of the bearclaw poppy and 66% of the Holmgren milkvetch habitat. Recommendations for minimizing cumulative impacts were included in Section 4.14.3.1. As noted in this section, through the Southern Corridor process the responsible state and local land agencies have been conducting surveys of habitat so that plans can be developed to minimize indirect impacts.</p>
	C-56.31	Threatened and Endangered Species	4.14	<p>Comment – Section 4.14.3.1, Recommendations for Minimizing Cumulative Impacts. This is the section where the grant from EPA to the City of St. George should be mentioned. The work done under the grant should be taken into account in this analysis. We have not seen the report yet, but my understanding is that if the plan is implemented, it may reduce expected VMT and protect or minimize impacts to the bearclaw poppy and milkvetch habitat, but suggests that the Southern Corridor may be a significant commuting route to jobs. Please read the report when finalized in mid-June and make sure that results are summarized in this or other relevant sections.</p> <p>Response – A summary of the report has been included in the Final EIS.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-56.32	Construction Impacts	4.19	<p>Comment – Section 4.19, Construction Impacts. As stated earlier, construction impacts from this project are not so short-term. An additional impact should be added to the air quality impacts discussion, impacts from diesel-powered construction equipment. We have attached the construction mitigation measures used by Regions 9 and 10 as examples of mitigation which can be used for this project. We recommend you use them as appropriate.</p> <p>Response – A detailed discussion of construction-related air quality impacts was provided in Section 4.8, Air Quality Impacts. A reference in Section 4.19 to the air quality section was added. In addition, some of the EPA mitigation measures have been added to Section 4.8.</p>
	C-56.33	Mitigation Summary	4.23	<p>Comment – Section 4.23, Mitigation Summary. We recommend adding the air quality construction mitigation measures as well as whatever water quality additional measures would be required for de-icing and the TMDL, as well as more mitigation for habitat fragmentation such as agreements or processes by local governments which will reduce environmental impacts.</p> <p>Response – Additional mitigation measures for air quality, water quality, and habitat fragmentation have been added to Table 4.23-1, Mitigation Summary. See the response to comment C-56.24 regarding de-icing salts.</p>
	C-56.34	Water Body Modification and Wildlife Impacts	4.12	<p>Comment – Invasive Species. The document contains no information on invasive species. We do know that in the Colorado Plateau ecosystem, invasive species are a problem getting a great deal of attention, and that roads are a cause of the invasive species impact. We do not know whether in this particular area it is an impact. Please address whether this is an issue, and if so, what measures would be taken.</p> <p>Response – Information on invasive species and the measures to reduce these impacts were provided in Section 4.12.2, Wildlife Habitat. UDOT is committed to limiting invasive species and to revegetating the area with plant species native to Washington County.</p>
	C-56.35	Smart Growth	6.0	<p>Comment – Chapter 6 on Smart Growth. As stated before, this chapter is well done. We continue to believe that it would have been more useful to use this information to compare the sustainable growth scenario to the no-build and build alternatives on a few resources or to have more information for consideration of indirect impacts and mitigation.</p> <p>Response – Comment noted.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-56.36	Alternatives	2.0	<p>Comment – Note: It does not appear that the road to the new St. George airport was taken into account in this DEIS. The EA for the airport clearly stated that the road impacts would be addressed in this EIS. Please disclose these impacts.</p> <p>Response – The St. George Airport EA does analyze the impacts of the proposed city road to the airport from the north but does not consider the Southern Corridor highway. Currently the airport plan is being revised and an EIS is now being completed for the airport. Because the airport plan is being revised, the exact location of the airport road is not known. In discussions with the Federal Aviation Administration, the road will be analyzed in the St. George Replacement Airport EIS.</p>
William H. King and Tony Frates – Utah Native Plant Society; Bob Hoffa – Grand Canyon Trust; Daniel R. Patterson – Center for Biological Diversity	C-57.1	Alternatives	2.0	<p><i>Note: On July 9, 2003, these commenters submitted a revised version of their original comments from May 30, 2003. This FEIS includes only the revised version of their comments.</i></p> <p>Comment – The DEIS Assumes Status Quo and Fails to Take into Account Trends and Recent Events. The DEIS fails to take into account current and recent events that could result in a slowdown in the St. George area population growth and needs to be re-evaluated in the light of such things as 9-11, terrorism, wars, recession, hanta virus, and SARS [severe acute respiratory syndrome].</p> <p>The airline industry is severely depressed with many of the major carriers near bankruptcy and shows few signs of recovery in a post-9-11 world; this road is being built primarily to service an airport that could actually show a decline in usage. The DEIS fails to acknowledge the trend towards broad acceptance of mass transit across the country and what role it may play in St. George, assuming energy consumption will stay like it is even as the American energy system is nearing a stage of crisis in terms of available fossil fuels. Tourism may not play the role in the future that it has in the past. The building of the new St. George airport, which the Southern Corridor will serve, could be postponed.</p> <p>St. George is not an industrial city and has very little industry base. The DEIS acknowledges a lack of a centralized business district. The population of St. George has always been based on retirees and tourists and the businesses that support them. In the past, retirees and tourists who do not need roads to go to work were fueling growth of the population. The economy remains depressed and shows no signs of improvement; this has slowed tourism and, in turn, the need for growth. The county can therefore control this growth with appropriate planning and create an open-space environment in an extremely arid, water-poor area.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
				Response – Potential population growth is addressed in Section 1.5.1, Population Growth. The population growth was taken from official government projections for the next 30 years. It would be speculative to predict the impacts of how terrorism, SARS, interest rates, and wars might affect growth or tourism in the region. The proposed St. George airport is a federal project that is planned and therefore considered in this EIS. Indications from the City of St. George are that the airport will be built by 2010. See the response to comment C-55.3 regarding mass transit as an alternative.
	C-57.2	Environmental Consequences	4.0	<p>Comment – The DEIS ignores the fact that global warming is becoming a reality and the current climatic/drought stage could in fact last for a considerable period of time. Climatic/drought conditions have persisted through most of the 1990s creating serious problems and warning signs that cannot be ignored: the Virgin River in the year 2000 was approximately 25% of normal and Lake Powell is at 49% of normal in early 2003. The continued rise in temperatures (record-breaking weather several years in a row) may make the St. George area a less desirable place to live. The DEIS failed to analyze if the limiting factor of water supply will limit growth over the next 30 years. In fact it is not illogical to assume that the drought could extend throughout the entire period that the DEIS is intended to cover: an example would be the recent 30-year drought in northern Africa and currently there is no basis to assume this period of drought in Washington County will end any time soon.</p> <p>Response – Analyzing the potential climatic/drought conditions, how long they could last, and the impacts on the region would be speculative since there is no consensus on these issues. Information provided by the Utahns for Better Transportation on the Legacy Parkway project noted a study conducted by Dr. Fred Wagner at Utah State University which predicted that precipitation could increase as much as 50 to 100% by the end of this century. See the response to comment C-57.1 regarding population projections.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.3	Purpose and Need	1.0	<p>Comment – The DEIS further assumes that the next 30 years will be one of high growth like the last 30 years. The DEIS, Section 1.5.1, states that the population of St. George in 2030 will be 122,727 people, according to the model from the Governor's Office of Planning and Budget. A confidence interval or probability of this increase occurring is not given. Furthermore, these estimates are deemed too low because of future land use plans in St. George and the estimates are increased to 147,990 residents in 2030 and are used in the DEIS to justify this project. However, the large supply of available land in the land use plan does not create demand for that land. Taking into account the above long-term negative factors on demand, it is just as reasonable to assume that a no-growth or slow-growth scenario will take place. Given a 2% per year growth rate to 2030, the population would only be 90,568. This lower number does not justify the proposed Southern Corridor and calls out for a more conservative project.</p> <p>The DEIS fails to take into account the role that interest rates play in making housing in St. George affordable to those who move to town. Currently, interest rates are at a 45-year low and can only go up, reducing immigration to St. George and reducing the populations' growth rate in the future.</p> <p>Response – See response to comment C-57.1.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.4	Alternatives	2.0	<p>Comment – No-Build Alternative Is Invalid. A valid “no-build” alternative has not been provided in the DEIS. Further, the arguments “for” the provided No-Build Alternative are at least in part not valid. The statement on page 4-87 (paragraph 4.14.1.1) is speculative and the impacts would have to be analyzed separately. It is a false statement that threatened and endangered species habitats were not found in the St. George replacement airport.</p> <p>Of most concern, the DEIS makes the following contradictory statements concerning the three alternatives (DEIS p. S-8):</p> <p>“This alternative would help BLM provide a barrier to protect the Warner Ridge population of endangered bearclaw poppy from recreation activities.”</p> <p>And then this statement about the No-Build Alternative:</p> <p>“This alternative would not provide a barrier to protect the Warner Ridge population of endangered bearclaw poppy from recreation activities.”</p> <p>Beyond the contradictory nature of these statements, we completely reject them as lacking scientific basis and in fact, are misleading and should be removed from the DEIS and not be considered as a favorable factor in connection with any “build” alternative.</p> <p>Response – In the Environmental Assessment for the proposed airport, no impacts to threatened or endangered species plant habitat were noted. The statement is not contradictory regarding Warner Ridge habitat protection. The build alternatives could provide a barrier to protect this area, whereas the No-Build Alternative would not because a road in that area would not be constructed. The BLM believes that the Southern Corridor would block the current unrestricted access to the Warner Ridge area and allow them to better manage access.</p>
	C-57.5	Alternatives	2.0	<p>Comment – A “no-build” alternative must be developed that will have no impacts on rare plant species.</p> <p>Response – The No-Build Alternative analyzed is what might happen if the Southern Corridor is not built. It is not the responsibility of a federal agency to develop different no-build scenarios.</p>
	C-57.6	Alternatives	2.0	<p>Comment – Other Alternatives Have Not Been Adequately Explored. A consideration of other options has not been provided. The DEIS only considers alternatives to the northern connection route to the town of Hurricane. No alternatives are considered near the new airport. The widening of I-15 or moving the road further south (into Arizona if necessary) to avoid White Dome are other possibilities that have not been considered.</p> <p>Response – See response to comment C-32.3.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.7	Threatened and Endangered Species	4.14	<p>Comment – Seed Bank Study Needed. The DEIS fails to provide any study for seeds in the soil. It is well known that seeds of <i>Arctomecon humilis</i> [bearclaw poppy] are initially undeveloped and may take several years for the embryo to develop. The amount of seed bank (especially given drought conditions of the past 5 years) has been shown to be a critical factor in the survival of this species (and could also be in connection with others). Just because a live plant specimen was not found does not mean that plants have not grown in any proposed areas of disturbance and seed bank studies must be conducted for the federally listed species. It is known that the <i>Arctomecon humilis</i> seeds can be viable for 10 years or more.</p> <p>Response – The seed bank of the poppy is important to long-term survival based on preliminary studies by Nelson and Harper (1991). However, future establishment of poppy will be exceedingly difficult because of the severe disturbance that currently exists along the right-of-way at White Dome. Soils are severely compacted and cryptogammic plant cover (soil microbiotic crust) has been destroyed by ORV use. A two-track road extends through the western portion of the right-of-way exacerbating ORV use and soil erosion. Prior to construction of the Southern Corridor, rare plant searches will be conducted within the right-of-way to determine if poppy is capable of establishing in this highly degraded habitat. The results of such surveys would be coordinated with USFWS as stated in the Biological Opinion for the project.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.8	Threatened and Endangered Species	4.14	<p>Comment – Rare Bee Study Needed. While the DEIS makes reference to the fact that rare bee/pollinators are in the study area (see pp. 4-88 to 4-89), there is in fact no scientific basis to gauge the impacts since the locations of the pollinators are not known. Therefore, protecting “ground-nesting pollinators” as described on DEIS p. 4-126 cannot possibly be undertaken without a bee/pollinator study, which needs to be done in connection with <i>Arctomecon humilis</i>, <i>Astragalus holmgreniorum</i> [Holmgren milkvetch], and <i>Pediocactus sileri</i> [Siler cactus].</p> <p>Any plan to ensure the survival of the bearclaw poppy, according to Vincent J. Tepedino (research entomologist, USU Bee Lab), must include protection of its pollinators. The USFWS acknowledges that little is known about the rare bee pollinators. In fact, there may be more than the two native bee species that are involved (there may be two species of <i>Perdita</i> for example). <i>Perdita meconis</i> [Mojave poppy bee] was only first described in 1993; it is considered rare and should be managed as a sensitive species. Utah has a huge diversity (over 1,000 species) of native bees and there could be a heretofore-unidentified bee species that is playing a significant role in the survival of the federally listed species. In addition to this, while the <i>Synhalonia</i> is not as rare as <i>P. meconis</i>, its nesting locations are not known.</p> <p>Response – The EIS discusses impacts to ground-nesting bees and concludes that the reduction in pollinators could reduce gene flow between populations, which could affect the reproductive success of the poppy. Therefore, the analysis covers the most damaging scenario, reduction in pollinators. These impacts were also considered in the USFWS Biological Opinion. Mitigation measures were developed to minimize these impacts if the pollinators are in the study area. The mitigation on page 4-126 of the Draft EIS was developed to replace vegetation in areas disturbed by construction along the entire right-of-way which would include any areas that may contain pollinators. If a bee/pollinator study was conducted and determined that they exist in the potential construction zone, the results of the analysis would be the same. In addition, ground-nesting bees are probably not present because of the severe soil disturbance and high ORV use within the right-of-way at White Dome. It is likely that disturbance will increase and these potential nesting sites will be impacted because White Dome is not protected.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.9	Threatened and Endangered Species	4.14	<p>Comment – The DEIS contains inaccurate statements which indicate that the appropriate experts, such as Vincent Tepedino, have not been properly consulted. For example:</p> <p>“Synhalonia is not specific to poppies.” (DEIS, p. 4-88)</p> <p>This is incorrect and it is obvious that qualified entomology experts, such as Vincent Tepedino, have not been consulted.</p> <p>The statement that the milkvetch is “self-compatible and not totally dependent on animal pollinators” (DEIS, p. 4-88) is not entirely true. Studies need to be conducted to determine the (a) quantity and (b) viability of self-pollinated versus out-crossed fruits.</p> <p>The DEIS has not taken into consideration available data from studies conducted by the USU Bee Lab which could shed further light on the status of bee/pollinators in the proposed construction area.</p> <p>Response – On April 29, 1999, Vince Tepedino sent an e-mail to Amy McMullen of Entranco regarding the potential effects of the Southern Corridor on bees (e-mail on file). Mr. Tepedino indicated that <i>Synhalonia quadricincta</i> is a specialist species that visits only poppy genera (<i>Arctomecon</i> and <i>Argemone</i>) for pollen. The EIS has been revised to state that <i>Perdita meconis</i> and <i>Synhalonia quadricincta</i> are rare ground-nesting bees and are potential pollinators to poppy. The actual statement from p. 4-88 of the DEIS is “<i>Perdita meconis</i> and <i>Synhalonia quadricincta</i> are rare ground-nesting bees and are pollinator-specific to poppies.”</p>
	C-57.10	Threatened and Endangered Species	4.14	<p>Comment – Pollination Study Needed. This is a different issue, although related, to the rare bee issue. The new highway will likely create a barrier to pollinators who are traveling between populations. Contrary to the assertion of the study, construction of the highway will likely reduce the gene flow and lead to gene loss or genetic drift and hasten the extinction of three federally listed endangered plant species. While specific studies about bees and highway traffic are not known, there are studies analyzing the impact of highway traffic on insects which show heavy insect losses and this impact has not been gauged in any way in the DEIS. For example, <i>Synhalonia quadricincta</i> is suspected of being capable of pollinating Warner Ridge and White Dome; what impact would the construction of the highway have on this process?</p> <p>Response – See response to comment C-57.8.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.11	Threatened and Endangered Species	4.14	<p>Comment – Soil Analysis Needed. There appears to be no soil analysis considered in the DEIS. Cryptogammic soil has been determined to be important for the survival of some of the listed plant species. Appreciable loss of cryptogammic soil from highway construction could have a serious negative effect on the endangered plant populations; it is vital that this issue be addressed.</p> <p>Response – Additional soil analyses are not needed to understand the relationship of cryptogammic crust to poppy populations. Nelson and Harper (1991) found that cryptogams contributed to 84% of the total living cover at poppy sites, but cryptogammic cover at random sites (non-poppy sites) was also similar to that found at poppy sites. This research indicates that poppy occurrence cannot be predicted on cryptogams alone. The level of soil analyses needed to show cause and effect is beyond the level of analysis required for an EIS. It is more accurate to say, “cryptogams may be important to poppy.”</p>
	C-57.12	Threatened and Endangered Species	4.14	<p>Comment – Critical Habitat Designation Required. Recently (late June 2003), a preliminary meeting was held by the USFWS in St. George to discuss a multi-species recovery plan for the four listed plant species identified by this project (three of which have been identified as being likely harmed). Follow-up meetings are planned for the fall. The USWFS also intends to designate critical habitat for the two <i>Astragalus</i> species as well as <i>Arctomecon humilis</i>. Until the multi-species recovery plan process is completed and the critical habitat is designated, no disturbance of actual or potential habitat should occur. After critical habitats for all endangered species in the project have been designated, these habitats should be avoided by any road project.</p> <p>Response – The actual completion date of the multi-species recovery plan and the listing of additional species have not been determined. NEPA does not require a project proponent to stop the process but to use current available data. If the project does not proceed three years after completion of the EIS, a re-evaluation would be conducted.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.13	Threatened and Endangered Species	4.14	<p>Comment – Sensitive Plant Species Not Surveyed. The DEIS and prior plant surveys limited its scope of analysis solely to four federally listed endangered plant species. The DEIS is required to consider federal and state sensitive and rare plant species as well. The viability of all species within the project must be ensured including the following, which are known from the St. George area and grow within the elevation range of the Southern Corridor road project:</p> <p><i>Camissonia panyi</i>, <i>Cirsium virginense</i>, <i>Cynanchum utahense</i>, <i>Enceliopsis argophylla</i>, <i>Eriogonum subreniforme</i>, <i>Lomatium scabrum</i> var. <i>tripinnatum</i>, <i>Oenothera deltoides</i> var. <i>decumbens</i>, <i>Pediomelum mephiticum</i>, <i>Petalonyx parryi</i>, <i>Phacelia anelsonii</i>, <i>Sclerocactus johnsonii</i>, <i>Yucca elata</i> var. <i>utahensis</i></p> <p>All of these sensitive species are on the Utah Division of Wildlife Resources, June 1998 “rare” or “watch” species lists. <i>Cirsium virginense</i> [virgin thistle] and <i>Petalonyx parryi</i> [Parry’s sandpaper plant] are on the BLM, August 2002, draft sensitive species list for Utah. <i>Cirsium virginense</i>, <i>Enceliopsis argophylla</i>, and <i>Phacelia anelsonii</i> are on the Nevada Natural Heritage rare or watch lists.</p> <p>Ron Kass listed <i>Petalonyx parryi</i> as a species associated with <i>Arctomecon humilis</i> on May 8, 2000, at Warner Ridge in his technical report of September 2000. He also located <i>Petalonyx parryi</i> in the survey of the Atkinville interchange on October 31, 2000.</p> <p><i>Tetradymia axillaris</i> var. <i>longispina</i> and <i>Tricardia watsoni</i> are on the BLM Arizona Strip Field Office Special Status List, are known from Washington County at the right elevation, and should be surveyed for too. <i>Enceliopsis argophylla</i> is also on the BLM Arizona Strip list.</p> <p>Failure to survey for these species and mitigate for their presence could trigger the need for these species to be listed, i.e. could cause them to become threatened or endangered.</p> <p>Response – The EIS has been updated to include the potential impacts to these species.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.14	Threatened and Endangered Species	4.14	<p>Comment – Plant Survey Inadequacies. Miscellaneous comments: The method of the plant pre-surveys only involved checking records collected from the BYU Herbarium. Other major herbariums, as well as the Utah Natural Heritage Program, should also have been consulted.</p> <p>Response – A letter addressed to Ben Franklin, botanist (Utah Natural Heritage Program) dated March 12, 1999, was sent requesting any additional input on threatened and endangered plants (letter on file). There were also several phone conversations with Mr. Franklin concerning the Southern Corridor. Dr. Ron Kass who conducted the pre-survey and surveys for the project noted that Brigham Young University has the best representation of rare plants in the State, and the need to check other herbaria would not have significantly altered the inventory efforts or the results. Additionally, the USFWS has concurred with the results of the survey as detailed in the Southern Corridor Biological Assessments.</p>
	C-57.15	Threatened and Endangered Species	4.14	<p>Comment – Dr. Kass is a well-known botanist; however, he assisted with other bird and animal surveys. His credentials in this regard have not been presented in the DEIS.</p> <p>Response – Dr. Kass has a BS in zoology and has participated in animal inventories for 25 years. Dr. David Lightfoot (University of New Mexico, desert ecologist) and Dr. Geoff Carpenter (New Mexico State Heritage Program, herpetologist) conducted the animal studies and Dr. Kass (botanist) and Dr. Dawson (animal nutritionist) provided assistance.</p>
	C-57.16	Threatened and Endangered Species	4.14	<p>Comment – Page 3-51. <i>Arctomecon humilis</i> occurs throughout White Dome and White Dome represents critical habitat for the species.</p> <p>Response – The EIS has been revised to note that <i>Arctomecon humilis</i> were discovered at White Dome. The EIS states that White Dome does contain habitat for this species. The area of the proposed Southern Corridor has been heavily disturbed by ORV use.</p>
	C-57.17	Threatened and Endangered Species	4.14	<p>Comment – Page 3-52. <i>Pediocactus sileri</i> has already been “taken” in connection with the airport project and it is likely to occur in the study area.</p> <p>Response – No threatened and endangered plant species were noted at the proposed St. George Airport site. Because no airport construction has occurred, no species have been taken. <i>Pediocactus sileri</i> was found several hundred feet east of the Southern Corridor right-of-way at Warner Ridge, but was not found within the right-of-way.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.18	Threatened and Endangered Species	4.14	<p>Comment – Biologic Assessment Lacks Scientific Evidence. The DEIS's one-for-one proposal for habitat exchange is not acceptable and is not scientifically valid. The federally listed species cannot be successfully germinated and survive for any period of time outside of their natural environment, nor can they be transplanted successfully. Their unique growing conditions cannot be easily duplicated. The one-for-one exchange does not provide any real mitigation of the damage whatsoever. Further, if it were to do any possible good and have any chance to succeed in this extremely fragile, arid land, the exchange would have to be more like 50:1.</p> <p>Response – FHWA reinitiated the Section 7 process with the USFWS based on new survey data. Based on the new information, the mitigation ratio has been revised to 3-for-1 for direct impacts and 5-for-1 for indirect impacts. Also see the response to comment C-36.4.</p>
	C-57.19	Threatened and Endangered Species	4.14	<p>Comment – Furthermore, there is no scientific basis or evidence that is indicated in the biologic assessment that the highway will form a corridor to help protect the northernmost population of <i>Arctomecon humilis</i> on Warner Ridge. The fact is that this area is already at least partly fenced and a more appropriate mitigation action would be to fix the broken fence, add more fence where needed, patrol the area, and increase public education. The highway will not fix the ORV/OHV problem; in fact, quite the opposite will occur. At least one interchange has been proposed for the area that will only <i>increase</i> access to Warner Ridge, not decrease it.</p> <p>Response – See response to comment C-55.13. The Warner Ridge area east of the proposed Southern Corridor is not fenced; therefore, according to BLM, the highway itself would provide a barrier which would limit the access points to this area and allow improved management. The potential interchange would provide access to the west only, away from Warner Ridge, and would be one of the few areas where BLM would need to manage access instead of the entire area if the highway was not built. The east side of the interchange would have a right-of-way fence along with appropriate signs to limit access.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.20	Threatened and Endangered Species	4.14	<p>Comment – We are unaware of a single instance where a highway has been proven to be a corridor for an endangered plant species and request explanation for that rationale, which we believe is entirely without basis. Richard Forman, one of the authors of the new book <i>Road Ecology: Science and Solutions</i> (Island Press, 2003), suggests that busy roads create an “avoidance zone” which is shunned by many types of wildlife and that it is not a good use of funds for conservation organizations to be protecting wildlife habitats next to busy roads. Heavily used roads fragment sensitive plant populations and habitats rather than protect them.</p> <p>Response –USFWS recommended that, in areas with populations of Holmgren milkvetch, the right-of-way of 300 feet be maintained and the highway footprint be minimized to protect the habitat. However, all habitat within the right-of-way would be considered impacted and required to be mitigated. The recommendation was provided to minimize the overall impact and was not intended to be a corridor for endangered plants.</p>
	C-57.21	Threatened and Endangered Species	4.14	<p>Comment – The Most Knowledgeable Experts Have Not Been Consulted. On page 4-82 of the DEIS the statement is made that “No trend data on plant species were available.” This is simply not true. Drs. Harper and Van Buren have been collecting data in the area on these species for over 10 years. The appropriate experts have not been consulted in the drafting of this DEIS. On page 4-89 it is stated that the “bearclaw poppy grows abundantly at White Dome.” This is not true. White Dome, a critical habitat for <i>Arctomecon humilis</i>, has been (despite the efforts of the State Lands &amp; Forestry in the 1980s), badly damaged by ORV/OHV use and while some plants do still grow there, they are by no means growing abundantly. Page 4-89 also refers to a fencing of White Dome, which is something we have always supported, but as far as we are aware is not contained in the Washington County Habitat Conservation Plan.</p> <p>The BLM Arizona Strip Field Office has maintained a monitoring file for <i>Astragalus holmgreniorum</i> since 1988. The BLM Arizona Strip Field Office also maintains a monitoring file for <i>Pediocactus sileri</i>. These files should have been reviewed for the DEIS and trends therein stated in the DEIS.</p> <p>Response – Lori Armstrong, botanist for the BLM who has funded the trend studies on <i>Astragalus holmgreniorum</i>, was consulted, and in 1999, no trend data were published. However, the results of Van Buren and Harper’s work were used in the EIS analysis. A recent paper by Harper and Van Buren (2003) has been reviewed by Dr. Kass, and the results would have not altered the outcome of the inventory. The BLM monitoring data for <i>Pediocactus sileri</i> was reviewed by Ron Kass prior to the inventory. The revised information in the FEIS takes into account new surveys conducted by Van Buren in 2003 and 2004 for the Holmgren milkvetch and bearclaw poppy.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.22	Threatened and Endangered Species	4.14	<p>Comment – Mitigation – No Habitat Loss Is Acceptable. Last year's continued drought has created the worst ever germination for both the poppy and the milkvetch—these two species may be in the worst condition ever. Data is available showing population losses are as much as 75% (Shinob Kibe preserve) compared to two years ago. No further loss of habitat is acceptable to this species. DEIS page 4-99, for example, seems to imply that because of the claimed 0.1% impact to poppy habitat that the impact will be of no consequence. In fact, the full cumulative impacts of the last 30 years have shown exactly these kinds of impacts, which are leading these species to the path of extinction. Until or unless the USFWS designates critical habitat for these species, no further habitat on which the species, or their seeds, are found or are known to occur can be lost.</p> <p>Response – See response to comment C-32.2.</p>
	C-57.23	Threatened and Endangered Species	4.14	<p>Comment – BLM Management at Warner Ridge and ACEC Conflicts. A highway should not be built through an area already designated as a federal "Area of Critical Environmental Concern," ACEC. The highway should completely avoid traversing any part of the three ACECs in the corridor: Lower Virgin River, Red Bluff, and Warner Ridge/Fort Pierce. Further, in the DEIS, p.4-99, it is stated that the project would allow the BLM "to better manage OHV access along Warner Ridge." It is not understood how this could possibly be true in view of the fact that the highway will bring greater access points, more fence that will likely not be kept in repair, more people who will use the equestrian/hiking trail for OHV use, at least one and maybe more new interchanges into the area.</p> <p>Response – Potential highway alignments were coordinated with BLM to avoid sensitive areas within the ACEC boundary. See response to comment C-55.13.</p>
	C-57.24	Threatened and Endangered Species	4.14	<p>Comment – No Part of the Project Should Interfere with White Dome. White Dome was (in approximately December of 1983) declared a state ACEC. No part of the project should intersect or traverse White Dome.</p> <p>Response – Comment noted. The EIS analyzes the potential impacts of the Southern Corridor alignment, which is immediately south of White Dome. See response to comment C-36.8 regarding moving the alternative alignment to avoid threatened and endangered species habitat and comment 55.14 regarding the ACEC status of White Dome.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.25	Water Body Modification and Wildlife Impacts	4.12	<p>Comment – Road Construction Will Increase Invasive Species. Construction of the project will bring increased invasive species, which are a problem for several of the listed species, especially in view of the location of the highway proximate to these populations. The impacts of these invasive species on listed species, sensitive species, and rare bee pollinators have not been analyzed.</p> <p>Response – Potential invasive species are discussed in Section 4.12, Water Body Modification and Wildlife Impacts. UDOT policies to control invasive species would be implemented. In addition, mitigation to minimize disturbing native vegetation from construction and to plant the right-of-way with native species has been developed to reduce potential impacts. Because of the implementation of invasive species control, minimal impacts should occur. See the response to comment C-57.8 regarding bee pollinators.</p>
	C-57.26	Water Body Modification and Wildlife Impacts	4.12	<p>Comment – Chemicals Spray Impact. To control invasive species mentioned above and in the rights-of-way proposed, it is presumed that chemical sprays may be used by UDOT to manage these areas. The impact of the use of these chemical sprays on rare bee pollinators as well on other sensitive wildlife (including plant species) has not been analyzed in the DEIS. Articles published by Vincent Tepedino need to be carefully studied (for example, <i>The Reproductive Biology of Rare Rangeland Plants and Their Vulnerability to Insecticides</i> — this article in fact includes information relating to <i>Astragalus holmgreniorum</i> and <i>Pediocactus sileri</i> — see <a href="http://www.sidney.ars.usda.gov/grasshopper/Handbook/pdfs/Mont_III/III5.pdf">www.sidney.ars.usda.gov/grasshopper/Handbook/pdfs/Mont_III/III5.pdf</a>). In conjunction with pollination biology studies, the appropriate “buffer zone” for the federally listed and other rare/sensitive species that will be impacted needs to be determined.</p> <p>Response – To minimize the impact from highway maintenance activities, signs will be placed along sensitive areas to notify crews to contact the UDOT regional environmental coordinator before activities take place. The regional environmental coordinator would ensure that appropriate maintenance activities take place to protect the species.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.27	Threatened and Endangered Species	4.14	<p>Comment – Toxic Runoff from Highways. Paragraph 6.4.3.2 acknowledges the toxic runoff from the new highway that will occur from rainstorms. Yet no analysis has been done to determine what impact this will have on rare bee pollinators as well as on other sensitive wildlife (including plant species).</p> <p>Response – Section 6.4.3.2 is a general discussion regarding impervious surfaces and is not specific to the Southern Corridor or the climate in the region. Section 4.10, Water Quality, provides details regarding runoff from the Southern Corridor. The analysis notes that normal ecosystem processes are generally affected only in areas that are within 15 feet of the highway. This area would be disturbed during the initial construction and would provide little benefit to wildlife or habitat for plant species. In addition, runoff from the Southern Corridor would be retained in roadside ditches and retention basins, therefore limiting potential impacts outside the highway right-of-way.</p>
	C-57.28	Threatened and Endangered Species	4.14	<p>Comment – Re-surveys Should Occur at the Appropriate Times. Re-surveys (see page 4-126 for example) need to be conducted at times when the listed species are in bloom. This includes early April to at least early June; the bloom times vary with the amount of precipitation.</p> <p>Response – Comment noted. The recommendation has been added to the EIS. In addition, the revised analysis in the FEIS took into account surveys conducted in 2003 and 2004 by Van Buren during the appropriate time of year.</p>
	C-57.29	Threatened and Endangered Species	4.14	<p>Comment – Revegetation. We support revegetation of native species, but they should be indigenous to Washington County (see for example page 4-126). Xeriscaping (see page 6-8) must be carefully managed to avoid using plants that are known to become invasive.</p> <p>Response – Comment noted. The recommendation has been added to the EIS.</p>
	C-57.30	Threatened and Endangered Species	4.14	<p>Comment – ORV Study Needed. Construction of the highway will attract more people, more development, and lead to more ORV/OHV use, likely hastening the extinction of the rare plant species. Analysis of the impacts of increased ORV/OHV use needs to be done.</p> <p>Response – The population growth and associated development in the Dixie area will occur with or without the Southern Corridor. As noted in the EIS, this growth will put increased pressure on public and private land and on sensitive plant species. The proposed Southern Corridor would not directly or indirectly cause increased ORV/OHV use, and therefore a study as part of this project does not need to be conducted.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.31	Smart Growth	6.0	<p>Comment – Policy of Open Space Increases, Not Decreases, the Area's Value. A retiree/service economy as acknowledged by the study dictates a policy and culture of open space which will increase, in the long term, property values as it will increase the desirability both to live and visit the St. George area. The study seems to fail to recognize this basic fact.</p> <p>Response – The potential use of smart growth is addressed in Chapter 6, Smart Growth. In addition, Section 4.3.6, Quality of Life, analyzes potential changes to the quality of life in the area as a result of regional growth.</p>
	C-57.32	Threatened and Endangered Species	4.14	<p>Comment – The Proposed Highway Is Hastening the Demise of a Sensitive Area of Biodiversity of Which There Is No Equal in Utah. The building of the corridor will spark development and will precipitate “sell-offs” of state lands that would otherwise not occur in the immediate future (White Dome for example) at artificially inflated prices. This will then more likely lead to a loss of habitat for rare and sensitive species.</p> <p>Response – The cumulative impact analysis in Section 4.14, Threatened and Endangered Species, notes the potential impacts to sensitive species as a result of regional development that would occur with or without the Southern Corridor. Chapter 2, Alternatives, notes that the already-developed nature of the area north and west of I-15 and the 61,022-acre Red Cliffs Desert Reserve limit future development to the areas south and east of I-15 where the Southern Corridor is planned.</p>
	C-57.33	Environmental Consequences	4.0	<p>Comment – DEIS Does Not Disclose Full Range of Cumulative Impacts. Pages 2-24 through 2-26 and C-21 discuss the “interchange” creep that will occur. No protection will later be afforded endangered wildlife and plant species as these interchanges are built and the DEIS is not properly determining the impact of these interchanges.</p> <p>Response – The EIS notes that the future potential location of interchanges could have impacts on sensitive species. The analysis in the EIS includes the locations identified in the EIS. However, because the exact location of these interchanges will be determined based on how development occurs in the area, the impacts could change. Additional environmental documentation will be conducted to address the construction of interchanges. In addition, the cumulative impact analysis assumes that all developable areas (non-federal land) will be developed and, therefore, includes the land adjacent to interchanges as well as any state and private land.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.34	Threatened and Endangered Species	4.14	<p>Comment – Note that while on the one hand River Road is being avoided by the recommended alternatives, an interchange is being proposed with River Road under all of the build alternatives, the impact of which could be severe to the endangered and sensitive plant, bee, and other wildlife species occurring in the area. Further, the Atkinville interchange appears to be designed for a “Western Corridor” that is not discussed nor its associated impact discussed in the study. The resulting combined impact of this could be devastating to the survival of the impacted species.</p> <p>Response – This EIS is being prepared to address the purpose and need of the Southern Corridor. If a road west of the Atkinville interchange is planned, an environmental document will be prepared by the project proponent to address the potential impacts. River Road was eliminated from detailed study as an alternative for the Southern Corridor because an alignment at that location would not meet the project’s purpose and need. The State of Utah owns much of the land around River Road and is working with USFWS regarding endangered plant habitat. The cumulative impact analysis for endangered species includes the area around River Road being developed.</p>
	C-57.35	Threatened and Endangered Species	4.14	<p>Comment – We applaud SITLA for taking action to identify important habitat (see paragraph 4.14.3.1). However, they may have been misled into thinking that the only “sensitive” species were those that are federally listed and surveys for “sensitive” species identified elsewhere in this letter need to also be taken into consideration.</p> <p>Response – SITLA is conducting studies as part of its process to develop land in the St. George area, and this development is being done independent of this project. SITLA is coordinating their efforts with USFWS.</p>
	C-57.36	Economic Impacts	4.5	<p>Comment – The negative impact to St. George businesses caused by diverting traffic to Zion National Park through the new corridor has not been analyzed.</p> <p>Response – Section 4.5, Economic Impacts, analyzes the potential of bypass impacts. Research has concluded that such impacts would be comparatively small.</p>
	C-57.37	Alternatives	2.0	<p>Comment – Summary. The purpose and need section of the DEIS for the proposed Southern Corridor does not substantiate and support the building of up to 28 miles of new road and as many as 18 new intersections. There are no alternatives analyzed in regard to the vast majority of the project.</p> <p>Response – Including the interchange at I-15, between 10 and 12 interchanges could be included as part of the Southern Corridor project. See comment C-32.3 regarding reasonable alternatives.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-57.38	Alternatives	2.0	<p>Comment – The “no build” alternative is invalid because it calls for the building of other roads. Further studies of sensitive, rare, and threatened plant species as well as their seed bank, soil, pollinators, and habitat are called for to ensure their viability. Cumulative impacts have not been fully disclosed and studied. Mitigation measures to prevent impacts to endangered species are insufficient. Because of the inadequacies in the DEIS, any conclusions reached from the DEIS cannot be supported and are capricious and arbitrary.</p> <p>Response – See the responses to comments C57.1 through 57.37.</p>
Willie R. Taylor – U.S. Department of the Interior, Office of Environmental Policy and Compliance	C-58.1	Recreation Resources	3.3.9	<p>Comment – Page 3-17 - Section 3.3.9, Recreation Resources. The descriptions of the various recreation resources are informative and succinct; however, some of the descriptions do not explain who manages the land. We recommend that this information be included to help clarify which resources qualify as Section 4(f) properties.</p> <p>Response – The land ownership and/or land managing agency has been added to Section 3.3.9.</p>
	C-58.2	Cultural Resources	4.15	<p>Comment – Page 4-102 - Section 4.15.1, Cultural Resources. The first paragraph of this section states that a total of 89 sites are eligible for the National Register of Historic Places (NRHP); however, the text in the Affected Environment states that there are 85 NRHP-eligible sites. Please clarify the discrepancy. Also, the last sentence of this paragraph states that 9 sites are in the 3400 West area of potential effect, while Table 4.15-1 states that there are 69 sites. Again, please clarify the discrepancy.</p> <p>Response – The text has been revised in Section 4.15.1 to 85 sites, and the reference to 9 sites has been revised to 69 sites.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-58.3	Sections 4(f)/6(f) Evaluation	5.0	<p>Comment – We are concerned that the Section 4(f) Evaluation does not adequately analyze the Section 4(f) properties located in the project area. We note in the DEIS a letter dated January 11, 2002, from the Department's Bureau of Land Management (BLM) providing a list of Section 4(f) properties in the project area; however, the Section 4(f) Evaluation dismisses many of these as being Section 4(f) properties. The Section 4(f) Evaluation also states that no Section 4(f) properties will be impacted, but the Environmental Consequences chapter of the DEIS states that many of the Section 4(f) properties identified by BLM will be directly or indirectly impacted by one or more of the alternatives.</p> <p>Based on the above information, we suggest that a more complete Section 4(f) Evaluation be developed in accordance with the information BLM provided in their January 11, 2002, letter and the 1987 FHWA Section 4(f) Policy Paper. More specifically, we recommend the following:</p> <ul style="list-style-type: none"> <li>• Verify that all impacted Section 4(f) resources are analyzed in the Section 4(f) Evaluation. As a reminder, both existing and future planned resources can qualify as Section 4(f) properties.</li> <li>• Impacts to each Section 4(f) property must be analyzed for each alternative carried forward, including a detailed analysis of the location, context, duration, and intensity of the impact. Impacts should be described according to the project's "use" and "constructive use" of the Section 4(f) property. This analysis is required for all types of impacts including beneficial or adverse, and temporary or permanent.</li> <li>• Avoidance alternatives must be addressed in order to demonstrate that there is no feasible and prudent alternative to the use of Section 4(f) properties. This includes different location alternatives and design shifts that avoid the use of that land.</li> <li>• Mitigation measures need to be disclosed in the Section 4(f) Evaluation to show that the project includes all possible planning to minimize harm to Section 4(f) resources.</li> <li>• A coordination section must be included to describe what public and agency involvement has occurred with regards to the Section 4(f) Evaluation. A conclusion section is also required.</li> <li>• As for cultural resources, please discuss how you determined which archaeological sites warrant preservation in place. This should be conducted in consultation with the SHPO.</li> </ul>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
				<p>Response – The 4(f) section has been revised. FHWA has determined that there are no 4(f) properties along the alternatives and the bases for this analysis is included in Chapter 5, Section 4(f) Evaluation. Because no 4(f) properties are impacted no avoidance alternatives are required.</p> <p>Additionally, after the release of the Draft EIS in March 2003, BLM provided a letter concurring with FHWA's 4(f) determination on BLM-administered lands (see Appendix I, page I-3). The BLM letter noted: "The St. George Field Office staff has reviewed the determination of Section 4(f) significance made by FHWA concerning the Sand Mountain SRMA, Sand Hollow Recreation Area, and Warner Ridge/Fort Pearce ACEC. We concur with the determination that these are not Section 4(f) properties as described in 23 CFR 771.135 (a)(1). We also concur with FHWA determination that the Southern Corridor could occupy the right-of-way of the commuter road around the Sand Hollow Reservoir."</p>
Roger G. Taylor – BLM Arizona Strip Field Office; James D. Crisp – BLM St. George Field Office	C-59.1	Land Use	3.1, 4.1	<p>Comment – Public lands within the administrative area of SGFO [St. George Field Office] are managed under objectives and decisions codified in the <i>St. George Record of Decision and Resource Management Plan</i> (RMP), approved in March 1999. No reference is made in the DEIS to this RMP, either in Section 1.1.3.2 which describes "Local Planning Studies and General Plans" (page 1-5), or in Section 3.1.3.1, "Local Land Use Plans" (p. 3-3). In other sections of the DEIS (e.g., 4.12.2, Wildlife Habitat), management direction from the RMP for public lands within the proposed Southern Corridor study area is paraphrased, but no citations provided to indicate the source. Similarly, no references are made to applicable land use plans for the adjacent Arizona Strip public domain lands.</p> <p>Response – Appropriate references to the BLM Resource Management Plans have been added to Chapters 1, 3, and 4.</p>
	C-59.2	Land Use	4.1	<p>Comment – Any proposals for land uses that would not be in conformance with the RMP must be denied or the RMP amended. BLM requires that all NEPA documents disclose whether project proposals are in conformance with the approved RMP and provide specific citation(s) of the management decisions that relate to the proposal. A copy of the RMP was made available to HDR during the early phases of the DEIS preparation: the Southern [Transportation] Corridor, including a "bypass spur" along the Hurricane Cliffs to connect with SR 9, was identified in the RMP (ROW-LD-16, page 2.5) as "within the scope" of the SGFO RMP. If this EIS is to be adopted by SGFO BLM as its NEPA analysis to support the granting of a right-of-way across public lands for the project, this conformance screening must be included.</p> <p>Response – A conformance analysis has been added to Section 4.1, Land Use.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-59.3	Land Use	3.1 and 4.1	<p>Comment – In the Summary section of the DEIS (S.1), the last sentence notes the project purpose of providing a regional transportation facility to “complement local land use plans.” We believe that either the word <i>local</i> should be removed, or the reference should be expanded to include other relevant <i>state</i> and <i>federal</i> land use plans. Similarly, other sections of the DEIS that enumerate and describe land use plans applicable to the proposed project area (see above) should also be expanded to include state and federal plans.</p> <p>Response – The term “local” was removed. The land use section of the EIS now includes a discussion of BLM Resource Management Plans.</p>
	C-59.4	Summary	S	<p>Comment – The Summary chapter at S-2 also contains errata in the discussion of the multi-species Habitat Conservation Plan for Washington County, approved by USFWS in 1996. The now nearly 62,000-acre Red Cliffs Desert Reserve was established at that time, not “would be established” as the text here states.</p> <p>Response – The EIS has been revised as stated.</p>
	C-59.5	Land Use	3.1, 4.1	<p>Comment – The Southern Corridor project could influence alternative development for the planning process on adjacent public lands of the Arizona Strip. The rapidly increasing urban development in Washington County and associated land use and recreation pressures have clear direct, indirect, and cumulative impacts on the BLM lands and resources south of the state line on the Arizona Strip. The DEIS fails to analyze the impacts in the Arizona Strip.</p> <p>Response – As noted in the comment, development in Washington County could put pressure on Arizona Strip BLM-administered public land. This development pressure will occur with or without the Southern Corridor, although the timing of development could occur faster with the highway. Because the Southern Corridor is located in Utah, no direct impacts would occur to the Arizona Strip. Potential indirect impacts would be associated with any development that might occur as a result of the highway. Most of this development would occur on state land. Additional information regarding potential impacts to the Arizona Strip has been added to the EIS.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-59.6	Land Use	3.1	<p>Comment – Where the proposed Southern Corridor leaves I-15 and runs near or almost along the state line for some distance, the lands immediately adjacent to the south in Arizona are administered by Arizona State Lands. The DEIS should have referenced these state lands as well, along with the land use authority of Mohave County Arizona. The DEIS should have cumulatively analyzed the future prospects that these state lands within Mohave County may eventually be transferred into private ownership for development. Public lands managed by ASFO [Arizona Strip Field Office] generally surround these state lands on the west, south, and east, and come to within about 2 or 3 miles of the Southern Corridor. This general area has already experienced increasing levels of public use, including the visible proliferation of off-road vehicle impacts.</p> <p>Response – The Final EIS has been revised to include potential urban development on state land in Mohave County along River Road. In addition, an analysis of the potential for indirect impacts of development on the Arizona Strip Field Office district has been included in the Final EIS.</p>
	C-59.7	Land Use	4.1	<p>Comment – We anticipate that the future RMP will include specific decisions for this area relating to BLM's ability to implement projects, approve a variety of land tenure adjustments, and authorize recreational and other uses that will be requested or become necessary due to this development. It is crucial that all land use planning efforts by relevant federal, state, and local agencies in this region (on both sides of the state line) are effectively coordinated, so that adverse impacts associated with this rapid development will be avoided, reduced, and/or mitigated as much as possible. If this is not accomplished, a more piecemeal approach may result in an inadequate cumulative impacts analysis, poorly integrated developments, haphazard growth, unnecessary costs, and avoidable adverse impacts. We request that these concerns be thoroughly addressed in the FEIS for this proposed project.</p> <p>Response – The EIS analyzes the impacts of constructing the Southern Corridor project. The EIS is not being prepared to analyze all of the impacts associated with growth in southwestern Utah and northwestern Arizona, since the growth and development will occur with or without the Southern Corridor. Recommendations in Section 4.1.3.1, Recommendations for Minimizing Cumulative Impacts, have been added that the federal and state governments, along with the county and city governments, should coordinate so that adverse impacts are minimized. FHWA and UDOT are not responsible for mitigating cumulative impacts from development.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-59.8	All	All	<p>Comment – Page 2-5, paragraph 2, line 2 states that the “Red Cliffs Desert Reserve was established to protect the Mojave desert tortoise ... from future growth.” This statement is syntactically awkward and somewhat misrepresents the need for and intent of the Reserve. Washington County developed its Habitat Conservation Plan (HCP) for the federally threatened Mojave desert tortoise and other at-risk species. The HCP identified a number of management actions intended to assist the recovery and de-listing of the Mojave desert tortoise and prevent the need to list other species, including both wildlife and native plants. A critical component of the HCP was the establishment of a ‘Reserve,’ where management would focus on protecting species from the direct and indirect effects of a variety of human activities, such as mining, utility corridor developments, roadways, landfills, certain recreation uses, residential and commercial construction, domestic livestock grazing, and other actions that can directly or indirectly impact sensitive species and their habitats. The threats and impacts were not just limited to “future growth.” By protecting species and their habitats, through the various actions of the HCP including the management of the Reserve, Washington County is able to proceed with orderly growth and other development on private, municipal, and state lands in the county.</p> <p>Response – The discussion of the Habitat Conservation Plan in the EIS has been updated as noted in the comment.</p>
	C-59.9	Alternatives	2.0	<p>Comment – On Figure 2-2 (Regional Alignment), the location of the study area is graphically depicted. This area appears to be arbitrarily narrow where it leaves I-15 to stay north of the state line, and then it greatly expands in width as it proceeds north and northeast toward Hurricane. There is no explanation for this discrepancy in relative width along the study area. But the practical result is that the study area does not include, as it should, the relevant portion of the Arizona Strip. This fundamental defect should be corrected in the FEIS.</p> <p>Response – The figure (Figure 2-3 in the Final EIS) has been revised to note that the study area is only for selecting the Southern Corridor alignments. The study area identified in the figure is not for the specific resources analyzed in the EIS. The study areas associated with individual resources are much broader in geographical scope as identified in Chapter 3, Affected Environment.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-59.10	Alternatives	2.0	<p>Comment – Similarly, in Figure 2-5 (Other Alternatives Considered), there are three green cross-hatched polygons to indicate Holmgren milkvetch habitat. Two of these polygons abruptly and arbitrarily terminate at the state line, without reference to whether they continue south of this line. Obviously, biological resources such as this plant species do not respect state boundaries, nor do the cumulative human impacts from the Southern Corridor project or other developments end at these legal boundaries. We believe that the FEIS must address and analyze possible impacts on the Holmgren milkvetch and other resources on a holistic basis, regardless of the location of the state line.</p> <p>Response – The crosshatched areas do not end at the state line but in fact include portions of habitat in Arizona. The purpose of the figure is to show the boundary of potential sensitive plant species habitat in relationship to an identified alternative. The figure was not intended to show all of the habitat in the region.</p> <p>The Arizona Game and Fish Department was contacted and two listed species, Holmgren milkvetch and desert tortoise, were identified as potentially occurring within 3 miles of the Southern Corridor. This information was included in the EIS. Although the Holmgren milkvetch in Arizona would not be directly affected by Southern Corridor construction, the habitat in Arizona on state land was included in the cumulative impacts discussion of the DEIS. In the cumulative analysis, it was assumed that the Arizona state land would be developed and the habitat would be lost.</p>
	C-59.11	Affected Environment	3.0	<p>Comment – Chapter 3 uses the terms “study area” on an apparently <i>ad hoc</i> basis; the inconsistencies are confusing and unexplained. In describing some resources, the scale of the “study area” is broad and regional, reaching to the state line, sometimes south of that line, and extending to the county boundaries. For other resources, the use of “study area” describes the presumably smaller-scale “project area.” Consistency in terminology and some standardized definitions of terms are desperately needed here.</p> <p>Response – The EIS has been revised to clarify the term <i>study area</i>. At the beginning of each resource section, a specific study area for that resource area is identified. The study area for each resource area is based on the potential for that resource to be affected by the Southern Corridor project.</p> <p>For example, the study area for paleontological resources is limited to those resources that could be affected by direct impacts from the highway and does not include every potential resource in the region. NEPA notes that EISs should be analytic rather than encyclopedic; therefore, only those resources that have the potential to be affected by a project should be addressed.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-59.12	Land Use	3.1	<p>Comment – Section 3.1.1, paragraph 2. This section describes the administrative status of lands in the “study area,” rather than the more restricted project area, and lists several federal agencies, including BLM, BIA [Bureau of Indian Affairs], NPS [National Parks Service], and the (U.S. Department of Agriculture’s) Forest Service. The following statements then focus on the Federal Land Policy and Management Act (note correct title) of 1976 (Public Law 94-579, 90 STAT 2743). It is unclear why FLPMA is called out for specific discussion here, since no linkage between that Act and BLM is offered.</p> <p>The terms “public lands” in this section of the DEIS are used collectively to include all “federal lands, wilderness areas, state lands, and open space” (Section 3.1.2, sentence 2). This usage is directly contrary to the definition provided in FLPMA, also referenced in this section. FLPMA provides legislative direction for “public lands”—by definition in that Act, those federal “lands and interest in lands owned by the United States within the several States and administered by the Secretary of the Interior through the Bureau of Land Management.” FLPMA does not apply to federal lands administered by the U.S. Department of the Interior’s NPS, BIA, or the USDA Forest Service, but rather only to “public lands administered by the Secretary of the Interior through BLM.” This distinction is not made here nor is there a linkage made between FLPMA and BLM that would help the reader understand why FLPMA (as BLM’s “organic act”) is even discussed here.</p> <p>Response – The reference to FLPMA has been clarified in the EIS.</p>
	C-59.13	Land Use	3.1	<p>Comment – Further, as noted above, nowhere in the DEIS is any reference made to the FLPMA-generated St. George Field Office RMP (1999), the approved land use plan for BLM-administered public lands in Washington County that comprise a substantial percentage of the proposed Southern Corridor project area, nor to the Arizona Strip RMPs, currently undergoing new planning. These BLM RMPs were prepared to be consistent, to the extent possible, with local municipal and county plans.</p> <p>Response – References to the St. George and Arizona Strip Field Offices’ Resource Management Plans have been added throughout the EIS. In addition, a discussion of these plans has been added to the land use sections of the EIS.</p>
	C-59.14	All	All	<p>Comment – As we have noted in prior comments, public lands are “administered [not owned] by the Secretary of the Interior through the Bureau of Land Management.” Ownership of these lands resides with the “United States.” The DEIS should be globally changed to replace <i>BLM-owned</i> with <i>BLM-administered</i> where this usage remains.</p> <p>Response – The EIS was revised based on prior comments made by BLM. No references to BLM-owned lands were made in the DEIS.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-59.15	Land Use	3.1	<p>Comment – Section 3.1.2, Existing Land Use. The last sentence of this section describes the “BLM-administered Beaver Dam Mountains Wilderness Area that [in Utah] is comprised of slightly less than 2,700 acres of public lands.” The DEIS makes no mention of the substantially larger total acreage (15,821 acres) of the designated Wilderness Area, which is contained in Arizona. The maps figures incorrectly label this as the “Beaver Mountain Wilderness Area” (e.g., Figure 3-2). Corrections need to be made to figures and text in the DEIS. The DEIS also does not reference other comparable significant designations in the same geographic region of Arizona, particularly the Paiute Wilderness Area and Grand Canyon–Parashant National Monument.</p> <p>Response – The EIS has been revised to include the acreage of the Beaver Dam Mountains Wilderness Area in both Utah and Arizona and to use the correct name. As discussed in comment C-59.11, EISs should be analytic rather than encyclopedic. Because the Paiute Wilderness Area and Grand Canyon–Parashant National Monument are outside the area likely to be affected by the Southern Corridor, they were not analyzed in the DEIS. The increase in population in southern Utah, the amount of land that is developed, and the resulting pressure on these areas will occur with or without the Southern Corridor. However, a figure has been added and analysis included in the Final EIS regarding the Arizona Strip Field Office planning area.</p>
	C-59.16	Land Use	3.1	<p>Comment – Section 3.1.3, “Local” Land Use Plans. See comment [59.3] above regarding the need to include in this section those federal and state plans which provide management direction for lands within and adjacent to the proposed project area.</p> <p>Response – A discussion of the federal land management plans has been added to Section 3.1.3.</p>
	C-59.17	Grazing Allotments	3.2.5	<p>Comment – Figure 3-7 (BLM Grazing Allotments within Study Area) only indicates allotments in Utah without referencing those within a similar geographic radius in the Arizona Strip. Please correct this omission in the FEIS.</p> <p>Response – The study area for grazing allotments includes those that could be affected on federal land by construction of the Southern Corridor, which is entirely located in Utah. Both the direct and indirect impacts to these allotments are analyzed. Because allotments in Arizona would not be directly affected by the Southern Corridor, they are not analyzed in detail in the EIS. Contact was made with the Arizona Strip range manager and additional information on indirect impacts were obtained and included in the EIS.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-59.18	Recreation Resources	3.39	<p>Comment – Section 3.3.9, Recreational Resources. This section contains a number of errata and omissions concerning BLM-administered recreation resources in and near the project area. The section is also in need of revision to more logically order the resources and areas described. Paragraph 2, line 1 of the introductory section requires the addition of the following: “personal interviews with [recreation specialists] with state and federal [land managing] agencies.”</p> <p>In contrast to most other DEIS graphics, Figure 3-9 (Recreational Resources) <i>does</i> include references to some Arizona Strip features, such as the Dutchman and Sunshine Loop Trails. However, we believe that the FEIS should provide more thorough references to other proximate recreational designations in the ASFO 1992 RMP. For example, the annual Rhino Rally competitive motorcycle events have occurred on BLM lands on both sides of the state line.</p> <p>Response – The EIS has been revised to correct the changes requested by BLM. The Rhino Rally noted in the EIS has been revised to include Arizona. Those recreational resources that could be affected by the Southern Corridor project have been noted in the EIS.</p>
	C-59.19	Historic, Archaeological, and Paleontological Resources	3.15, 4.15	<p>Comment – Dominguez-Escalante Trail/Old Spanish Trail. Additional information is needed here to address recent Congressional legislation (2003) that designated the Old Spanish Trail as part of the National Historic Trails system. One of the alignments of the newly designated National Historic Trails crosses public lands on the Arizona Strip, near the Utah state line; another passes along the upper Santa Clara River and over Utah Hill in western Washington County, presumably within the “study area,” but outside the proposed project area. Since the DEIS considers effects to historic trails and displays them on Figure 3-9, additional information on the recently designated Old Spanish Trail, at least the alignment near the project area on the Arizona Strip should be included and any project-related impacts also disclosed.</p> <p>Response – Additional information regarding the Old Spanish Trail has been added to the EIS. Since the trail is designated a National Historic Trail, information was added to the historic, archaeological, and paleontological sections of the EIS (Sections 3.15 and 4.15). In the study area, the trail follows the Fort Pearce Wash in both Utah and Arizona. The Southern Corridor crosses the Fort Pearce Wash in Utah; therefore, no direct impacts would occur in Arizona. In addition, no features defining this resource are located in the portion of the Fort Pearce Wash crossed by the Southern Corridor. Finally, given the flooding that occurs in the wash, a bridge would be used to span the area limiting any ground impacts.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-59.20	Visual Resources	3.17	<p>Comment – Figure 3-16 (Visual Resources Key Observation Points) includes one point (KOP-1) just north of the state line, but none immediately south of the line. This is arbitrary because visual observations and resources are not changed by the presence of this line. We recommend that the FEIS provide some additional observation points at appropriate locations within the Arizona Strip looking north. The information from these points would explain how the visual resources would change for Arizona Strip visitors and users.</p> <p>Response – White Dome would be viewed from the both Arizona state land and BLM-administered Arizona Strip land, so the analysis is valid. The visual analysis was not arbitrary, but included the visual sensitive areas that were likely to be impacted no matter where they were viewed from. Since no land in Arizona would be impacted, no visual assessments were conducted in Arizona. In addition, a visual survey was conducted from the Arizona Strip in July 2003, and it was determined that there would be little impact to the visual environment because of the intervening topography and the distance to the proposed Southern Corridor. The analysis in the Final EIS has been updated to include information regarding visual impacts to the Arizona Strip.</p>
	C-59.21	Land Use	4.1	<p>Comment – As with Chapter 3, there are many places in Chapter 4 (Environmental Consequences) where potential impacts on BLM-administered or state-owned lands on the Arizona Strip are ignored or given short shrift. Indeed, the arbitrary limit on the southern extent of the study area correlates with many of the missing or deficient analyses of impacts. For example, the discussion about the number and location of interchanges by alternative generally does not reference compatibility with the ASFO 1992 RMP decisions nor what these interchanges may portend for the new ASFO RMP planning process. The proposed interchange at River Road is instructive. River Road proceeds south and becomes a primary travel corridor that provides access deep into a more remote portion of the Arizona Strip, with connections to roads that extend into the new Grand Canyon–Parashant National Monument. Thus, the FEIS should address how the placement of interchanges near the state line, including one at River Road, may impact Arizona Strip resources and uses, even those farther to the south in more remote settings.</p> <p>Response – As noted in the EIS, the exact locations of interchanges have not been finalized because the exact nature of development is unknown. As the interchanges are identified, separate environmental documentation will be prepared. However, Section 4.1, Land Use, has been revised in the Final EIS to programmatically analyze additional effects from the interchanges.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-59.22	Land Use	4.1	<p>Comment – Section 4.1.2, Consistency with Plans and Policies. See comments above concerning BLM requirements for disclosing project conformance with management decisions from BLM's approved SGFO RMP (1999) and the need to include other applicable federal and state plans in relevant sections of the DEIS.</p> <p>Response – Section 4.1.2 has been revised to include a discussion of conformance with BLM plans.</p>
	C-59.23	Threatened and Endangered Species	4.14	<p>Comment – Section 4.14, Threatened and Endangered Species Impacts. We question the discussion on page 4-86 that paraphrases management objectives and direction from the BLM's 1998 Proposed RMP (rather than the 1999 approved RMP, which is the land use plan of record). This section focuses its "analysis" not on the project-specific mitigation measures and/or environmental commitments developed for the Southern Corridor project and how those might lessen or eliminate project-related impacts on listed species, but rather on BLM's management objectives for listed species. This discussion appears to commit BLM and other federal agencies to being somehow "responsible" for mitigating the effects of the Southern Corridor on listed species. While BLM's approved SGFO RMP (1999) does articulate broad management goals and objectives for at risk species, these are not project-related mitigation, are always subject to funding and staffing constraints, and may change over time, based on changing resource needs, legislative mandates, and other factors. BLM's overall management objectives for public lands would be more appropriately analyzed in the cumulative impacts section, not as substitute here for an analysis of project-related impacts and the efficacy of all proposed mitigation measures that are specific to the Southern Corridor project.</p> <p>Response – At the request of EPA, information on BLM management was put into the introduction of this section as an overview of area management policies. BLM is not responsible for the mitigation of listed species affected by the Southern Corridor. The text noted in the EIS came from the Resource Management Plan. Sections 4.14.1.5 and 4.14.2.5 detail the mitigation measures required as the result of the proposed highway and how these might lessen impacts. The analysis does not commit BLM to any mitigation, but only describes their current management objectives to provide a context for the region. In addition, BLM management objectives are noted in the cumulative impact analysis. The text has been revised to clarify BLM Resource Management Plan objectives.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-59.24	Grazing Allotments	4.2.4	<p>Comment – Section 4.2.4, Livestock Grazing. This analysis contains a number of errors. It also fails to include a scenario for analysis that was requested by BLM-SGFO, under which project-related effects to livestock grazing permit holders and their operations on public lands would have been mitigated through purchase and subsequent retirement of the grazing permits on those allotments where grazing operations would be substantially disrupted and potentially made less economically viable as a result of the disruptions. Also, we question whether any water development costs would have to be borne by the permit holder, since the need to replace or develop new water sources within affected allotments would have resulted from construction of the Southern Corridor. We believe this to be an erroneous conclusion.</p> <p>Response – The EIS does include both the direct and indirect impacts to grazing allotments. The analysis does address project-related effects on livestock including any impacts the project would have on the economic viability of the property if bisected by the proposed highway including removing water supplies. As part of the analysis each permit holder was called and/or met with to obtain project specific information. The EIS has been updated to remove the statement regarding the permit holder being responsible for water development cost. In addition, the BLM range specialist has been contacted to verify the analysis included in the Final EIS.</p>
	C-59.25	Water Body Modification and Wildlife	4.12	<p>Comment – Section 4.12.2.1. In the analysis of the No-Build (No-Action) Alternative, the last paragraph of that section paraphrases language from the Proposed Dixie Field Office Resource Management Plan/Final EIS (1998) as BLM's management objectives and direction for public lands and resources. Technically, since an approved RMP was put in place in 1999, the management objectives and direction must be derived from that plan, rather than the Proposed RMP. The approved RMP (1999) should be cited here.</p> <p>Response – The text has been revised to include the 1999 Resource Management Plan.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-59.26	Threatened and Endangered Species	3.14	<p>Comment – The DEIS's species-specific descriptions, including those in Section 3.14.2 (Federally Listed Species), generally only address the potential impacts on those species within the “study area.” Some of these descriptions also summarize the status or trend of the species within Utah, without reference to their status or trend in Arizona. As previously noted, species do not respect state boundaries and the DEIS study area is arbitrarily narrow near the state line and does not address impacts south of this line. The concern is that some of these descriptions—particularly for the more mobile, sparsely distributed, rare, or wide-ranging species—may be incomplete or inaccurate. Since the biological status and requirements of these species are not affected by the presence of the state line or any other legal boundary on a map, the analysis should not be artificially limited by these lines. As such, the study area should be expanded southward in the FEIS, the Arizona status or trend should be added where appropriate, and these species-specific descriptions should be revised accordingly.</p> <p>On the one hand, we recognize that even with the preceding revisions, in perhaps the vast majority of cases, the outcome of the analysis may not change due to the similarity of habitats on both sides of the state line and the relatively stable, localized use of these habitats.</p> <p>Response – The Arizona Game and Fish Department was contacted regarding threatened and endangered species and the information added to the EIS. The Holmgren milkvetch and desert tortoise were identified by the Department as occurring in the study area. Trend data for Arizona for these species were also included in the EIS. The cumulative impact analysis provided in the DEIS does include habitat for these species in both Utah and Arizona.</p>
	C-59.27	Threatened and Endangered Species	4.14	<p>Comment – On the other hand, we recognize that there are larger spatial scales beyond the scope of the DEIS “study area” that may be relevant for some species, but that were not considered in the DEIS. These species may tend to include those with large home ranges or the need for greater seasonal or elevational movements. It is important to analyze how impacts on both sides of the state line at this larger scale may cumulatively affect these species. This is necessary in light of the new scientific studies relating to landscape ecology and conservation biology. These studies demonstrate the importance of not only ignoring legal lines on maps when analyzing impacts on species, but also addressing the biological needs of different species at varying scales to move to find food, water, or shelter, escape predators, and reproduce. As you know, a project that directly or indirectly impedes such species movements may have far more serious impacts than those associated with the actual number of habitat acres physically converted for the project.</p> <p>Response – See response to comment C-59.28.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-59.28	Water Body Modification and Wildlife	4.12	<p>Comment – While the DEIS discusses wildlife movement and habitat fragmentation, it does not specifically address how the proposed alternatives and interchange locations may affect the meta-population dynamics of potentially vulnerable species. This includes whether the Southern Corridor project in combination with other developments will encircle or highly fragment habitats (such as those that sometimes remain on undeveloped lands, such as steep slopes and floodplains), or will significantly block the movement of some local species populations. Over time, these impacts could cumulatively cause inbreeding depression and “sink” populations (those where mortality exceeds recruitment). In turn, a combination of such “sink” populations can add up to local or even regional declines or extirpations for the affected species, and sometimes negatively contribute to the species’ overall status and trend throughout its range. It is obvious that the development patterns in the southern St. George Basin have the potential for much greater future disruption of species habitats and movements. These impacts will occur at several spatial scales, and may affect the future health and abundance of some species within the Arizona Strip.</p> <p>Response – Although there are no known movement corridors in the project area, the FEIS has been modified to place more emphasis on the design of bridges and/or large box culverts at most dry wash locations. This would allow wildlife to move from one side of the highway to the other in more places that may coincide with pre-project wildlife movement. This is in addition to the bridge proposed across the Fort Pearce Wash riparian area.</p> <p>While the project “study area” was defined graphically and in the text, for the purposes of the EIS, as not extending into Arizona, the evaluation of the potential for impacts on biological resources did take into account the potential movements and use of the project area by species with large territories. We are well aware that biological resources and their use of available habitat does not stop at, or coincide with, city, county, state, or federal agency jurisdictional boundaries. The analysis of the potential for impacts on biological resources, whether common, rare, or sensitive species or habitats, in the EIS did take into account the regional (landscape and/or ecosystem) level of population distributions, and the potential for portions of the territories of the larger species to overlap with the project area. Unless there is a large amount of future urban growth envisioned for that portion of the Arizona Strip to the south of the St. George area and the proposed Southern Corridor, restricted wildlife movement would primarily be from the local Arizona Strip area to the south, and portions of Utah to the east, into the St. George and Virgin River areas within the highway loop. With the implementation of design mitigations that have been added to the FEIS which include more bridges and large box culverts, the movement of wildlife would be allowed to continue. The greatest impact on biological resources would be the ongoing urbanization of the area to the north and west of the Southern Corridor.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
				While not specifically addressing meta-population dynamics of the potentially vulnerable species, the EIS does address the potential for impacts on such species. The impact of habitat fragmentation on such species due the proposed Southern Corridor project is minor compared to the ongoing, and planned, urbanization of the area that would continue regardless of whether the proposed roadway is constructed. It is unlikely that the restriction of movement corridors from any meta-populations within the area between the Virgin River and the Southern Corridor into the Arizona Strip would affect the viability of the populations in the Strip. The viability of populations of vulnerable species in the Arizona Strip is not expected to change, since migration in and out of those populations would continue between other populations to the north, east, west, and south that are outside of the Southern Corridor loop. Impacts to biological resources in the Arizona Strip as a result of the Southern Corridor project are expected to be minor.
	C-59.29	Mitigation Summary	4.23	<p>Comment – Mitigation and Monitoring. Finally, we request that the FEIS include a comprehensive and detailed listing, in one location or appendix, of all of the proposed mitigation and monitoring activities or projects associated with the construction and maintenance of the Southern Corridor. This listing should describe which agency is responsible for implementing each proposed activity or project, the estimated amount and availability of funds and staff necessary for implementation, the timeline or schedule for initiating and completing implementation, and the monitoring that will be done to determine relative effectiveness. This listing should also describe what remedies exist, if any, in the event that a proposed activity or project is not funded, initiated, completed, or otherwise effective. The subjects of mitigation and monitoring are very important, and need this level of detail and accountability. Otherwise, the public may suspect that mitigation and monitoring commitments in the FEIS are vague, illusory, or not otherwise taken seriously by the responsible agencies.</p> <p>Response – Table 4.23-1 in the DEIS does provide a comprehensive listing of all the mitigation measures listed in the EIS. The responsible parties for the mitigation and when the mitigation would be initiated have been added to the table. In addition, a discussion of mitigation monitoring, cost, and overall implementation strategy has been added to the EIS. Costs for the mitigation including necessary staff are included in the overall project cost, and UDOT or their designated contractor will implement mitigation. Because the final mitigation plan and overall implementation are considered in the design and/or construction contract, specific cost data and implementation strategies cannot be identified at this time.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
John Harja – Utah Governor's Office of Planning and Budget	C-60.1	Historic, Archaeological, and Paleontological Resources	3.14	<p>Comment – Utah Geological Survey personnel have noted that the DEIS, page 3-59, indicates that a paleontological survey was completed and refers the reader to Appendix H (Cultural and Paleontological Resources) for the survey report. However, Appendix H includes the results of only the Cultural Resources Survey that was conducted by Montgomery Archaeological Consultants, and does not include results from the Paleontological Survey Report conducted by A. Hamblin as a subcontract to the above report. This report includes an expanded list of geologic formations exposed in the project area that have the potential for yielding significant fossil localities, including the Jurassic Moenave and Kayenta Formations. These formations should be added to paragraph 1 of Section 3.15.2.4 (Paleontological Resources Inventory) at page 3-59. In addition, although paleontological mitigation recommendations are included in Section 4.15 (Impacts on Historic, Archaeological, and Paleontological Resources), page 4-101, the Paleontology Report, or a summary, should be included in Appendix H for completeness, and to accurately reflect the title of Appendix H.</p> <p>Response – A summary of the paleontological report has been added to the EIS. To protect these resources, site-specific data and maps were not included in the EIS. The formations in Section 3.15.2.4 have been updated to include all potential formations.</p>
	C-60.2	Economic Impacts	4.5	<p>Comment – For completeness and balance, impacts on future energy and mineral development should be addressed in the DEIS. Generally new or improved road access benefits energy and mineral development. Careful route planning can provide topographic screening of existing and potential development sites, which will make development more palatable to the public. Oil has been produced in small quantities from the Pennsylvanian Callville Limestone at the Anderson Junction field northeast of Toquerville and from the Triassic Moenkopi Formation at the Virgin field northeast of the town of Virgin. The Callville Limestone, Moenkopi Formation, and other stratigraphic units have speculative potential in other parts of Washington County. Much of Washington County has geothermal potential. The Southern Corridor area also has significant resources of sand and gravel, crushed stone, building stone, ornamental stone, and silica sand.</p> <p>Response – Section 4.5, Economic Impacts, notes that no mining activities or mineral areas would be affected. Currently, there are no developed energy resources or other mineral development areas along the proposed alternatives. The alternatives selected were based on input from the County, local cities, and BLM based on desires to minimize impacts to natural resources and to be consistent with proposed development patterns and land use and resource management plans.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-60.3	Alternatives	2.0	<p>Comment – Potential geologic hazards in the region that could affect the alignments may include slope instability (landslides, rockfall) and problem soils (shrink/swell and/or collapsible). The Utah Department of Transportation may want to consider geologic hazards at this point in the decision-making process as part of the feasibility analysis and safety evaluations. The Utah Geological Survey has general hazards information available for review at their offices.</p> <p>Response – A geologic survey of the project area was conducted and used in roadway design. Final considerations of potential geologic hazards are accounted for in the 100% design and by the construction contractor.</p>
	C-60.4	Recreation Resources	4.3.8	<p>Comment – The Utah Division of Parks and Recreation (State Parks) has expressed concern about Alternative D, the proposed 2800 West alignment as described in Section 2.2.4, page 2-26 of the DEIS and the resulting effects on the recently dedicated Sand Hollow State Park.</p> <p>State Parks personnel reviewed the DEIS as managers of Sand Hollow State Park with the responsibility of providing a positive experience for those who visit and recreate at the park. Consequently, while State Parks personnel support the project in general, they are concerned that the proposed 2800 West alignment, which runs directly through the park, would not be consistent with the needs of the park and would have negative impacts on park visitors, park resources, and proposed future park development.</p> <p>If implemented, the 2800 West alignment would create potential physical and esthetic barriers separating the reservoir area from the Sand Mountain portion of the park and blocking recreational access. This is inconsistent with park planning efforts calling for more open recreational access and opportunities to the Sand Mountain parcel within the park, as reflected in the Sand Hollow Recreation Area Recreation Management Plan (September 2001). The 2800 West alignment would likely require relocation of the proposed OHV campground and facilities at the foot of Sand Mountain and would negatively impact OHV use that occurs in this area. The park setting also would be altered significantly.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
				<p>The 4300 West or 3400 West alignments would have less of an impact on the park since these routes would not encroach park boundaries. For these reasons, State Parks has recommended that the 4300/3400 West, 4300 West and the 3400 West alignment alternatives, as outlined in the DEIS, be considered as favorable alignment alternatives for implementation in the area near Sand Hollow State Park.</p> <p>The department concurs with the concerns identified by State Parks regarding the 2800 West alignment. Additionally, the department concludes that the DEIS document itself does not adequately address the potential impacts of the proposed 2800 West alignment on Sand Hollow State Park. The DEIS addresses the "proposed Sand Hollow Recreation Area" (DEIS, page 3-3) but does not acknowledge the Sand Hollow State Park.</p> <p>Response – The EIS has been revised to include a more detailed discussion of impacts to the state park. At the time of release of the DEIS, Sand Hollow was not officially designated as a state park. This change has been made for the Final EIS. As noted in the analysis and the comment above, the potential impacts would be associated with blocking access between the SRMA and the state park. UDOT met with State Parks in August 2003 to further discuss park access. To avoid issues associated with access, and to be consistent with the recreation plan, the proposed alternative would follow an alignment similar to the commuter road shown in the plan. If the 2800 West Alternative is selected, UDOT would work with all applicable agencies to ensure that appropriate access between the two recreation areas is maintained. Because the commuter road was selected as the alignment, relocating park facilities would not be required. The mitigation in Section 4.3.8 has been revised to provide more details regarding access.</p>
	C-60.5	Recreation Resources	4.3.8	<p>Comment – The DEIS references the <i>Sand Hollow Recreation Area Recreation Management Plan</i> (May 2001) and includes as Figure 5-2 at page 5-9, Plate 7: Proposed Facilities, from the recreation management plan. However, the DEIS does not include Plate 6: Potential Recreation Opportunities, from the recreation management plan, which more accurately represents the planned development of Sand Hollow State Park. This information is necessary to adequately assess the potential impacts to the state park. The department recommends that the DEIS be revised to adequately consider Sand Hollow State Park in the analysis.</p> <p>Response – See response to comment C-60.4. Plate 7 shows the location of the proposed commuter road that would likely become the 2800 West Alternative and best displays the proposed alternative in relation to park facilities. Plate 6 noted in the comment is general in nature and shows facilities associated with the Sand Mountain SRMA but not specific facilities near the Southern Corridor. Plate 6 has been added to the EIS.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-60.6	Permits and Clearances	4.22	<p>Comment – The proposed project may require a permit, known as an Approval Order, from the Utah Division of Air Quality (UDAQ). If any rock-crushing plants, asphalt plants, or concrete batch plants are located at the site, an Approval Order from UDAQ will be required for operation of the equipment. In addition, the project is subject to R307-205-3, Fugitive Dust, since the project will have a short-term impact on air quality due to the fugitive dust that is generated during the excavation and construction phases of the project. A copy of the rules is found at <a href="http://www.rules.utah.gov/publicat/code/r307/r307.htm">www.rules.utah.gov/publicat/code/r307/r307.htm</a>.</p> <p>Response – Comment noted. The EIS notes in Section 4.22, Permits and Clearances, that an Approval Order would be required for the project.</p>
Gary S. Espin – City of St. George	C-61.1	Smart Growth	6.0	<p>Comment – Section 6.6 indicates that the City is in the process of revising its Land Use Plan and has a Draft General Plan. On July 11, 2002, the St. George City Council adopted the revised and updated General Plan for land use development in the city. The plan contains numerous policy statements incorporating smart growth concepts designed to preserve open space and promote water and energy conservation.</p> <p>Response – Comment noted. The St. George smart growth initiatives were noted in Chapter 6, Smart Growth.</p>
	C-61.2	Purpose and Need	1.0	<p>Comment – In 1996, the 62,000-acre Red Cliffs Desert Reserve was created under the premise that creation of the Reserve would free up the other private lands within the city for development. This has shifted development to other areas of the city including the South Block along the Utah-Arizona border. For many years, the City has been coordinating planning efforts with major landowners in this area such as Leucadia and SITLA to establish a detailed Master Plan for development. Any effort to expand reserve concepts into other areas of the city would undermine the integrity of development concepts established when the Red Cliffs Desert Reserve was implemented.</p> <p>Response – Comment noted.</p>
Gene Sturzenegger – Winding River Realty Utah	C-62.1	Alternatives	2.0	<p>Comment – Winding River Properties is opposed to both the 3400 West and 4300 West Alternatives. The type of transportation facility being planned, most importantly the limited intersections, will negatively impact access and quality of life of the total community currently being planned for the 2,200+ acres owned by Winding River. Further, plans for the development of the property have been occurring for several years and the development process is continuing. Waiting years for the planning of the Southern Corridor to progress to the point where the property can be developed with the “Corridor” in mind isn’t an option.</p> <p>Response – Comment noted.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Alan D. Gardner, James J. Eardley, and Jay Ence – Washington County Commission	C-63.1	Purpose and Need	1.0	<p>Comment – We consider circulation and transportation in southern Washington County to be the most serious and severe condition that this county faces and will continue to face in the next 20 years. As you are aware, our population nearly doubles every 10 years and has done so for the last 40 years. This means that by the next census, we will be approaching the 200,000 mark in population.</p> <p>With valleys surrounded by hills and with a river flowing through the center, there are only so many places that roads can be built. We can expand water systems, sewer systems, and electrical power availability, but at some point in the near future, we will be faced with gridlock on our streets and highways unless we can address seriously the traffic problem in the area.</p> <p>Response – Comment noted.</p>
	C-63.2	Alternatives	2.0	<p>Comment – We disagree that the Southern Corridor will have little impact on I-15. If some of that east-west traffic can be funneled off the freeway, it may be kept from becoming a “city street” as soon. We do agree that whether the Southern Corridor is built or not, I-15 will continue to become more congested requiring additional traffic lanes particularly between St. George and Anderson Junction. On the other hand, any east-west movement of vehicles in the county can only help to alleviate the situation.</p> <p>We would expect that one of the first segments to be built will be the section from I-15 to the new airport. This is a section that, along with the freeway interchange, should be under construction as soon as possible to have it completed when it is needed. However, the section should continue past the airport to SR 9.</p> <p>Response – As shown in Table 2.1-1, 2030 LOS, No-Build and Build Alternatives, the Southern Corridor would increase traffic on I-15 around the proposed Atkinville interchange but would decrease after the Green Springs interchange in eastern St. George.</p>
	C-63.3	Purpose and Need	1.0	<p>Comment – Washington County originally created the Southern Corridor Committee to look at the feasibility of creating a highway from SR 59 near Hildale to I-15. We still feel that this road is needed even if the Southern Corridor is constructed.</p> <p>Response – Comment noted.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-63.4	Alternatives	2.0	<p>Comment – As to the three alternatives proposed for the Hurricane portion of the roadway as it ties into SR 9, this is primarily a Hurricane City decision. We would accept any of those alignments, but prefer the 4300 West alignment for the following reasons:</p> <ul style="list-style-type: none"> <li>• Because of the increased cost and distance of the alternative connecting to 2600 West, and the fact that it forces traffic around the Sand Hollow Reservoir, this is our third choice. The cost of constructing this road from the Washington Dam road area to the top of the bluff west of the reservoir would be comparable to constructing SR 9 from the intersection of Old Highway 91 to the Virgin River. A very difficult, costly, and unnecessary expense.</li> <li>• Because of the extra time and distance involved, we would expect that it would carry significantly less traffic across the county, nullifying the most important reason for building the road, that of moving traffic.</li> <li>• We have no problem with the 3400 West alignment except that it goes through the center of a planned large-scale development. This alignment could cause problems with future development.</li> <li>• The farther west the connection to SR 9 is made, the more traffic that will use that route which will better help to spread traffic through the county.</li> </ul> <p>Response – Comment noted.</p>
	C-63.5	Alternatives	2.0	<p>Comment – The area served by the Southern Corridor will be developed with or without this important artery. To develop that much presently vacant land and to add that much additional population to the southern valleys of the county without major traffic carriers will bring about the gridlock we spoke about earlier.</p> <p>We cannot overemphasize the importance of regional planning for transportation throughout the southern part of the county. Four of the cities are identified as a metropolitan planning area. The technical staff of these cities, along with Hurricane, have been trying to address traffic problems, identify common routes, coordinate street locations and design standards, etc. for several years. This corridor is an important part of the planning effort. In addition to the alignment from I-15 to SR 9, we hope that the Department of Transportation will not forget about the alignment from I-15 to Santa Clara and Ivins on the west side of the valley. That segment of the corridor is also badly needed for the long-range development of these areas. Perhaps when this study is finally approved, UDOT might consider doing a similar study for the area west of I-15.</p> <p>Response – Comment noted.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-63.6	Alternatives	2.0	<p>Comment – It is important that this corridor be identified and protected from development at this point. It will be difficult enough to construct the roadway if the corridor is protected, let alone the problems that it would bring if development was allowed and developed land had to be purchased for a right-of-way.</p> <p>Response – Protecting the corridor from development would be the responsibility of the city and county governments.</p>
	C-63.7	Alternatives	2.0	<p>Comment – Finally, for many years there was a roadway planned from what is now the Snow Canyon Parkway to I-15 at about the proposed Mile Post 13 interchange. When the Desert Tortoise HCP was put in place, it eliminated the likelihood that this roadway will ever be built as it was originally planned.</p> <p>One of the major considerations for working on the HCP was that it would free up the balance of the county to allow development to continue. We recognize that there are some problems particularly with endangered plants and possibly an eagle's nest in the Southern Corridor alignment, but these are minor when considering that we gave up 60–70,000 acres of land north of the cities, most of which had good potential for development, to allow development elsewhere. We have done that in good faith and would hate to think that the environmental community would attempt to stop construction of this roadway after what we have already given up.</p> <p>Response – Comment noted. Throughout the EIS it is noted that development south of the project area is limited because of the Red Cliffs Desert Reserve.</p>
Gregg Frohman	C-64			<p>Comment – Same as comments C-46.1 through C-46.4 (comments from C-64 are the same as those from C-46).</p> <p>Response – See response to comments C-46.1 through C-46.4.</p>
David Orr	C-65			<p>Comment – Same as comments C-46.1 through C-46.4 (comments from C-64 are the same as those from C-46).</p> <p>Response – See response to comments C-46.1 through C-46.4.</p>
Lisa Mills	C-66			<p>Comment – Same as comments C-46.1 through C-46.4 (comments from C-64 are the same as those from C-46).</p> <p>Response – See response to comments C-46.1 through C-46.4.</p>
Maria Tilelli	C-67			<p>Comment – Same as comments C-46.1 through C-46.4 (comments from C-64 are the same as those from C-46).</p> <p>Response – See response to comments C-46.1 through C-46.4.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Jere Gimbell	C-68.1	Alternatives	2.0	<p>Comment – Please allow the forward progress of a highway between a new interchange on I-15 south of Bloomington and State Route 9 on the west side of Hurricane.</p> <p>Response – Comment noted.</p>
Janet Gillette	C-69.1			<p>Comment – See comment C-46.1.</p> <p>Response – See response to comment C-46.1.</p>
	C-69.2			<p>Comment – See comment C-46.2.</p> <p>Response – See response to comment C-46.2.</p>
	C-69.3			<p>Comment – See comment C-46.3.</p> <p>Response – See response to comment C-46.3.</p>
	C-69.4			<p>Comment – See comment C-46.4.</p> <p>Response – See response to comment C-46.4.</p>
	C-69.5	Environmental Consequences	4.0	<p>Comment – If we keep promoting development sprawl, we will no longer have this lovely country to enjoy.</p> <p>Response – Comment noted.</p>
	C-69.6	Smart Growth	6.0	<p>Comment – Where is the water going to come from to meet the needs of the increased population which will fill all those housing developments?</p> <p>Response – See response to comment C-35.1.</p>
Kirsten Shaw Fox	C-70			<p>Comment – Same as comments C-46.1 through C-46.4 (comments from C-64 are the same as those from C-46).</p> <p>Response – See response to comment C-46.</p>
Henry R. Maddux – USFWS, Utah Field Office	C-71.1	Water Body Modification and Wildlife Impacts	4.12	<p>Comment – We are concerned about the fragmentation of natural wildlife habitat unavoidably cause[d] by roads. To minimize those impacts to small mammals and reptiles, we suggest the liberal utilization of passage structures (i.e. large culverts, bridges, etc.) at all significant wildlife crossing points of the proposed highway. Many, but not all, of these passage structures would have a dual use as necessary drainage structures. Regular drainage structures should be evaluated for and, if need be, modified for this dual use.</p> <p>Response – The Final EIS has been revised to include mitigation to improve wildlife passage. The passage structures would use the numerous drainages that cross the highway.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	C-71.2	Threatened and Endangered Species	4.14	<p>Comment – In addition to small terrestrial vertebrates, we have a concern for insect pollinators, especially for the listed plant species discussed above. Fragmentation of natural wild land habitat has the potential to reduce genetic flow between populations of native species, including plants. This can be critical to the long-term viability of rare plants, such as those federally listed species in the vicinity of the Southern Corridor highway. In the future, we expect that much of the natural wild land habitat adjacent to the Southern Corridor highway will be developed for commercial, residential, and industrial uses. This will further isolate populations of those federally listed rare plant populations not directly displaced by those developments. The highway right-of-way outside the area physically occupied by the highway should be managed as a corridor for pollinator movement throughout the entire length of the proposed highway, especially at the western segment near Atkinville Wash and White Dome and central segment near Warner Ridge. At present, we do not have any specific conservation recommendations for the highway right-of-way other than leaving it in its natural state. However, we will continue to discuss this issue as new information becomes available.</p> <p>Response – The EIS includes the recommendations provided by USFWS regarding managing the right-of-way to minimize impacts to pollinator species.</p>
	C-71.3	Alternatives	2.0	<p>Comment – We believe the 4300 West Alternative has the least impacts to wildlife due to its shorter length and thus lesser impact to natural wildlife habitat. The 2800 West Alternative conversely would have the greatest negative impact to wildlife due to its greater length and the fact that its additional length is a function of its passing near the Sand Hollow Reservoir and adjacent natural wild lands of its surrounding Utah state park.</p> <p>Response – Comment noted.</p>
	C-71.4	Affected Environment, Environmental Consequences	3.0, 4.0	<p>Comment – The following are specific suggestions keyed to the text of the Southern Corridor DEIS:</p> <ul style="list-style-type: none"> <li>• Page 3-48: <i>Pediocactus sileri</i> is federally listed as threatened, not endangered.</li> <li>• Page 4-72: Add African mustard (<i>Malcolmia africana</i>) to the list of invasive weeds.</li> <li>• Page 4-86: Change “May affect, not likely to affect” to “May affect, not likely to adversely affect”.</li> <li>• Page 4-100: Change Holmgren milkvetch habitat ratio of BLM to state land from 44%:66% to 44%:56%.</li> <li>• Page 4-122: FWS incidental take permits apply to animals only, not plants.</li> </ul> <p>Response – The noted revisions have been made to the EIS.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Hank Isaksen – Outlaw Ridge Development Co.	C-72.1	Alternatives	2.0	<p>Comment – I'm opposed to both the 3400 West and 4300 West Alternatives as they have been presented. The alignment and limited-access facility being planned will limit access to my proposed development and, in my opinion, will ruin the quality of life of the Outlaw Ridge community currently being planned.</p> <p>Response – Comment noted.</p>
Deloss S. Hammon – Alliance Consulting	C-73.1			<p>Comment – Attached is a Land Use Plan, Slope Analysis, and a proposed Southern Corridor alignment for your review. We feel the proposed alignment best serves both the future development and the environmental needs of the project. [The maps mentioned in this comment are included in the project's Administrative Record.]</p> <p>Response – The proposed alignment shift was reviewed by both UDOT and FHWA. The alignment shift is a minor change in the 2800 West Alternative, and the analysis in the EIS generally accounts for the anticipated environmental impacts. Although the specifics of the alignment are not analyzed, the analysis does not preclude the alignment from being considered in the future during final design. However, additional biological and cultural surveys to cover the alignment shift will need to be conducted and provided to FHWA so that the appropriate environmental analysis can be performed. It should also be noted that the current 2800 West alignment in the EIS was developed in consultation with Washington County, the local cities, and federal resource agencies and therefore was included in the EIS.</p>
Darrell Hercyk	C-74			<p>Comment – Same as comments C-46.1 through C-46.4 (comments from C-64 are the same as those from C-46).</p> <p>Response – See response to comments C-46.1 through C-46.4.</p>
Judith Allison	C-75			<p>Comment – Same as comments C-46.1 through C-46.4 (comments from C-64 are the same as those from C-46).</p> <p>Response – See response to comments C-46.1 through C-46.4.</p>
R.G. Smith	T-01.1	Alternatives	2.2	<p>Comment – I'm here to make a comment that this area is growing, and we need another road to link I-15 to State Road 9, roughly, I'd say, 3400 South in Hurricane, that land clear without a bunch of homes in the way. They could put a four-lane highway. This area is growing. We have to get rid of this congestion. The freeway in St. George now can't handle all this in-come. It's just too much.</p> <p>Response – Comment noted.</p>
Sharon Orgill	T-02.1	Alternatives	2.2	<p>Comment – And after looking at all the maps and things that we've looked at on the tables, I feel like it would be best for the Corridor to come out at 3400 West. It seems like a perfect road for it to come out on as opposed to the others. It would be less congested at 3400 West.</p> <p>Response – Comment noted.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	T-02.2	Alternatives	2.2	<p>Comment – I think it would be a detriment if it came out on 4300 West, because they'd have to take out part of our park to get it in there. So I think it would be more congested there and more expensive to put an interchange in there. Plus we have lots of traffic.</p> <p>Response – The 4300 West Alternative would not impact any parks near SR 9. Under the 4300 West Alternative, an interchange would need to be constructed at SR 9 to address safety.</p>
Dale V. Orgill	T-03.1	Alternatives	2.2	<p>Comment – I feel that it should come out at 3400.</p> <p>Response – Comment noted.</p>
Margaret Pamela Humphries	T-04.1	Alternatives	2.2	<p>Comment – 3400 is better for sight, but I think in the long run 2800 West is a better alternative to exit onto SR 9. It not only opens up property, but it also helps alleviate some of the traffic in the south fields of Hurricane.</p> <p>Response – Comment noted.</p>
	T-04.2	Alternatives	2.2	<p>Comment – 4300 is a very bad choice for the way the traffic comes in and out right there anyway, and that's all we need is to have an interchange and more of a bottleneck.</p> <p>Response – Comment noted. The proposed interchange at 4300 West and SR 9 would minimize congestion if this alternative is selected.</p>
Mrs. Dubois	T-05.1	Purpose and Need	1.8	<p>Comment – I think the project should be on the east side of town, not on the west side.</p> <p>Response – See response to comment C-22.3.</p>
	T-05.2	Alternatives	2.2	<p>Comment – I am against the 4300 exit because it's very unsafe. You have a lot of old people that are retired, and you already have people getting killed in that area, and I think it's a very, very bad idea.</p> <p>Response – Comment noted.</p>
	T-05.3	Alternatives	2.2	<p>Comment – I am against 3400 because that's where I live. Before I bought my house, I know it had a city park right there off 9. My view is on a mountain at Quail Lake. Now my property is worth nothing. I wouldn't be able to sleep, it would be very noisy. I think it is absolutely terrible.</p> <p>Response – The 3400 West Alternative would not impact any city park. Because the exact location of your house is not known, we cannot predict whether noise levels would increase as a result of the 3400 West Alternative.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	T-05.4	Alternatives	2.2	<p>Comment – I think 2800 may be the best in your project, which as I said, the east side is much better than the west side. Concerning 2800, it is the best of the three because of the development of Sand Hollow Reservoir and sand dunes, for the recreation areas that have already received a lot of advertising.</p> <p>Response – Comment noted.</p>
Mr. Dubois	T-06.1	Alternatives	2.2	<p>Comment – The intersection of 4300 is rather dangerous right now for the gas station and retirement community, and the visibility is almost impossible trying to turn. We've seen a number of accidents in the year we've lived here.</p> <p>Response – Comment noted. If the 4300 West Alternative is selected, an interchange would be constructed to minimize safety hazards.</p>
Mrs. Thomas Blake	T-07.1	Alternatives	2.2	<p>Comment –We don't want a road through our property. We had to give up some before. We don't want to give up this. It's 4300. I think it should be one of the other routes, not that one. I think that's a very dangerous place to have it come out on this intersection, where the service station is there, Berry Springs, because there's already been accidents there. With all of the traffic that comes out this way, I think it's a dangerous place.</p> <p>Response – Comment noted. If the 4300 West Alternative is selected, an interchange would be constructed to minimize safety hazards.</p>
Brent Clove	T-08.1	Alternatives	2.2	<p>Comment – Out of the three proposals, not too interested in any of the three; however, I guess I'd go with the one that's the farthest east, which is the 2800 West one.</p> <p>Response – Comment noted.</p>
	T-08.2	Alternatives	2.2	<p>Comment – A concern is just like with the corridor between Hurricane and the Washington/Hurricane exit, they're planning on putting in stop lights. And the farther west that we put this corridor, the more likelihood that there will be a stop light between the corridor—additional stop lights between the corridor and Hurricane over the present condition. So it would ruin the effectiveness of the corridor by having to go through extra stop lights. So I would prefer to have the one that's farther east.</p> <p>Response – The 4300 West Alternative would increase traffic on SR 9 west of the connection by 7% and the 3400 West Alternative by 9% over the No-Build Alternative. This increase in daily traffic should not warrant additional traffic lights other than those required under the No-Build Alternative.</p>



Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
Burton L. Sant	T-09.1	Alternatives	2.2	<p>Comment – I think probably for Hurricane Valley the 2800 would probably be the best route. It would cut down congestion on SR 9 going toward the freeway.</p> <p>Response – Comment noted. See Table 2.1-1. The 2800 West Alternative would result in the least amount of traffic using SR 9 to I-15.</p>
David Hyatt	T-10.1	Alternatives	2.2	<p>Comment – I think we should just do the least obtrusive thing, go down around Sand Hollow, and that way it has less impact on the public. That land hasn't been developed yet, and it would make sense to go that route.</p> <p>Response – Comment noted.</p>
Desiree Whitehead	T-11.1	Alternatives	2.2	<p>Comment – I like the 2800 West Alternative because it will affect the least amount of people at this time and opens up a greater amount of area for growth. The private property that would have to be purchased on the other two alternatives would be more expensive and in the long run I think would cost more to purchase the property in order to run the roads through there. So I prefer the 2800 West Alternative.</p> <p>Response – Comment noted.</p>
Kenneth L. Allison	T-12.1	Alternatives	2.2	<p>Comment – I am commenting because I want to express my concerns about the cost of putting this road through. My estimation is that the shortest possible distance requires less maintenance, less installation, less right-of-way confrontations, less problems with right-of-way or achieving right-of-way. It requires—the shortest route requires less damage to the Red Cliffs area. There's going—the longer route around Sand Hollow is going to require a lot more blasting to get off that hill.</p> <p>Response – Comment noted. The 4300 West Alternative is the shortest route and would likely have the least amount of maintenance cost; however, the 3400 West Alternative is the lowest-cost alternative followed by the 4300 West Alternative. Because the Washington County Water Conservancy District stated that they would donate part of the right-of-way along the 2800 West Alternative, this alternative has the lowest right-of-way cost but the highest overall costs as a result of the overall roadway length. The 2800 West Alternative would require heavy construction over the ridge to the Sand Hollow area.</p>
	T-12.2	Alternatives	2.2	<p>Comment – I think the feasible one, probably the least expensive one, is the one in the center, which is—3400 West is probably the most feasible.</p> <p>Response – Comment noted.</p>

Commenter and Affiliation	Comment Number	Resource Area	EIS Section	Comment/Response
	T-12.3	Alternatives	2.2	<p>Comment-The road that's on the west side, which is 4300 West, which goes by all the existing sewer ponds, would require an overpass because of the traffic conditions there. But my challenge for that argument that would be one of these days we're going to have an overpass there anyway, because they've put an exit at that point to the public recreation area at Sand Hollow.</p> <p>Response – The 4300 West Alternative does include an interchange with SR 9.</p>
Mary Farrington	T-13.1	Alternatives	2.2	<p>Comment – I feel the same way [as Kenneth Allison].</p> <p>Response – Comment noted.</p>
Lowell Elmer – Director, Dixie Metropolitan Planning Organization	T-14.1	Purpose and Need	1.8	<p>Comment – The Southern Corridor is one of our highest-priority projects. As a matter of fact, if I was to rank them, it would be number two in our current priority list for the Dixie MPO area. And so we'd like to see it constructed as soon as possible.</p> <p>Response – Comment noted.</p>
	T-14.2	Alternatives	2.2	<p>Comment – We recognize that the first leg between Atkinville interchange and the area near the St. George relocation, airport would be our first priority for the Southern Corridor, which is right now our second priority of all of our needs that we have in the area.</p> <p>Response – Comment noted.</p>
	T-14.3	Purpose and Need	1.8	<p>Comment – Dixie is where most of the growth is going to occur, not just the airport but a lot of development and growth, commercial and residential. It is one of the few places left for growth to go. And the area is growing about five and a half percent per year. We see that continuing for some time. It may taper off a little bit. The Southern Corridor is an important link in the belt loop that we would like to see constructed here to help relieve traffic on our existing arterials and collector roads in the Dixie area.</p> <p>Response – Comment noted.</p>
Melvin L. Lloyd	T-15.1	Alternatives	2.2	<p>Comment – My comment is if they're gonna build this road, they need to make sure that they fund maintenance for it so that the people that are having to do that maintenance right now aren't overburdened more than they are.</p> <p>Response – Comment noted. Roadway maintenance would be conducted by the local cities, Washington County, or the State depending on the final route designation (local or state road).</p>